RECORD OF DECISION

FOR

SHERIDAN DISPOSAL SERVICES SITE

WALLER COUNTY, TEXAS

(GROUND WATER MIGRATION MANAGEMENT OPERABLE UNIT)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
SEPTEMBER 1989

#### DECLARATION FOR THE RECORD OF DECISION

### SITE NAME AND LOCATION

Sheridan Disposal Services site, Waller County, Texas

# STATEMENT OF PURPOSE

This decision document outlines the selected remedial action for the second operable unit at the Sheridan Disposal Services site in accordance with the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), and to the extent practicable, the National Oil and Hazardous Substance Pollution Contingency Plan, 40 CFR Part 300, November 20, 1985.

On December 29, 1988, a Record of Decision (ROD) was signed which selected the appropriate remedial action for the Source Control Operable Unit for the Sheridan site. The Source Control ROD addressed the risks associated with exposure to contaminated soils and sludges on the site.

This document is the ROD for the second operable unit, hereafter referred to as the Ground Water Migration Management, or GWMM unit. The ROD for the GWMM unit addresses the risks associated with the potential or actual exposure to contaminated ground water.

The State of Texas (through the Texas Water Commission) has been provided an opportunity to comment on the technology and degree of treatment proposed by the Record of Decision. The letter describing the State's concurrence with the selected remedy is found in Appendix C.

#### STATEMENT OF BASIS

This decision is based on the administrative record for the Sheridan site. The index found in Appendix A identifies the items which comprise this administrative record.

#### ASSESSMENT OF THE SITE

Actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response action selected in this ROD, may present an imminent and substantial endangerment to public health, welfare, or the environment.

# DESCRIPTION OF THE REMEDY

Upon review of the information contained in the administrative record, it is EPA's judgment that the natural attenuation alternative best serves both statutory and selection criteria in relation to the other solutions evaluated. A detailed description of this remedy and an explanation of how it meets statutory requirements is contained in the attached "Summary of Remedial Alternative Selection."

Implementation of the natural attenuation alternative requires the fellowing components:

- 1. The establishment of Alternate Concentration Limits (ACLs) as the site ground water protection standards.
- Ground water monitoring to ensure ACLs are not exceeded.
- 3. Sampling and analysis of the Brazos River immediately downgradient and upgradient of the point of entry of ground water from the site into the river.
- Implementation of controls to preclude potential use of contaminated ground water.
- 5. In the event ACLs are exceeded at sometime in the future, the implementation of a corrective action plan to ensure that protective levels are met at the point of potential exposure.

Implementation of these activities addresses the principal threat posed by the site by preventing exposure to contaminated ground water and by maintaining safe levels in the Brazos River.

# STATUTORY DETERMINATIONS

The remedy described above is protective of human health and the environment. attains Federal and State applicable or relevant and appropriate requirements and is cost-effective. This remedy satisfies the statutory preference for remedies that utilizes permanent solutions and alternative technologies to the maximum extent practicable. However, this remedy does not satisfy the statutory preference for treatment as a principal element because treatment of ground water contamination was found to be impracticable. Further, it should be noted that the Source Control remedy utilizes treatment as a principal element.

Because this remedy may result in hazardous substances remaining onsite above health-based levels, a review will be conducted within five years after commencement of the remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment.

Robert E. Layton Jr.

Regional Administrator

Sept. 27, 1989 Date

# SHERIDAN DISPOSAL SERVICES SITE WALLER COUNTY, TEXAS

SUMMARY OF REMEDIAL ALITERNATIVE SELECTION SEPTEMBER, 1989

# TABLE OF CONTENTS

,	CITI	LOCATION	PAGE
1.	2115	LOCATION	1
II.	HIST	ORY AND ENFORCEMENT	1
ш.	HIGH	LIGHTS OF COMMUNITY PARTICIPATION	2
IV.	SCOP	E AND ROLE OF OPERABLE UNIT	3
٧.	SITE	CHARACTERIZATION	3
	5.1	Geology	3
	5.2	Hydrogeology	3
	5.3	Samplings Results	4
۷Ι.	SUMM	ARY OF SITE RISKS	4
VII.	ALTE	RNATIVE EVALUATION	6
	7.1	Evaluation Criteria	6
	7.2	Description of Alternatives	8
	7.3	Evaluation of Alternatives	9
VIII	.SELE	CTED REMEDY	12
	8.1	Description of Selected Remedy	12
	8.2	Rationale for Selection of the Remedy	15
IX.	STAT	UTORY DETERMINATIONS	17
	9.1	Protection of Human Health and the Environment	18
	9.2	Compliance with Applicable or Relevant and Appropriate Requirements of Other Laws	18
	9.3	Cost-Effectiveness	19
	9.4	Utilization of Permanent Remedies and Alternative Treatment Technologies to the Maximum Extent Practicable	19
	9.5	Preference for Treatment as a Principle Element	20
х.	DOCU	MENTATION OF NO SIGNIFICANT CHANGES	. 20

# XI. APPENDICES

- A. Administrative Record
- B. Responsiveness Summary
- C. State Response to Record of Decision

# LIST OF FIGURES

FIGURE NUMBER	TITLE
1	General Site Location Map
2	Site Location Map
3	Site Plot Plan
4	General Schematic of Site Geology
5	Approximate Extent of Ground Water Contamination
6	Alternative 2: Partial Slurry Wall Alignment
7	Alternative 3: Recovery Well Configuration
8	ACL Points of Compliance

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# LIST OF TABLES

TABLE NUMBER	TITLE	
1	Geologic Description and Water-bearing Properties of the Geologic Units forming the Aquifers in Waller and Austin Counties	0 0
2	Summary of Highest Levels of Contaminants Detected in Shallow Ground Water	0 1 4
3	Summary of Alternative Costs	

#### I. SITE LOCATION

The Sheridan Disposal Services site is located approximately nine miles northnorthwest of the City of Hempstead in Waller County, Texas. The site covers about 110 acres in a 700-acre tract of land which is bordered by the Brazos River to the north and Clark Road to the South (See Figures 1 and 2).

Located at the site are a lagoon (12-22 acres depending on water levels), a 17-acre dike surrounding the lagoon, and a 42-acre evaporation/land irrigation system. An incinerator and a group of nine storage tanks which were used for waste storage and treatment are located on the lagoon dikes. These site features are illustrated in Figure 3.

The predominant land-use within a four-mile radius of the site is agriculture and range land. The only primarily residential area within this four-mile radius is the community of Brown College. This community is made up of approximately 20 residences and is located one and one half miles north of the site. Nearby communities primarily utilize ground water from the Evangeline aquifer to meet their water supply needs.

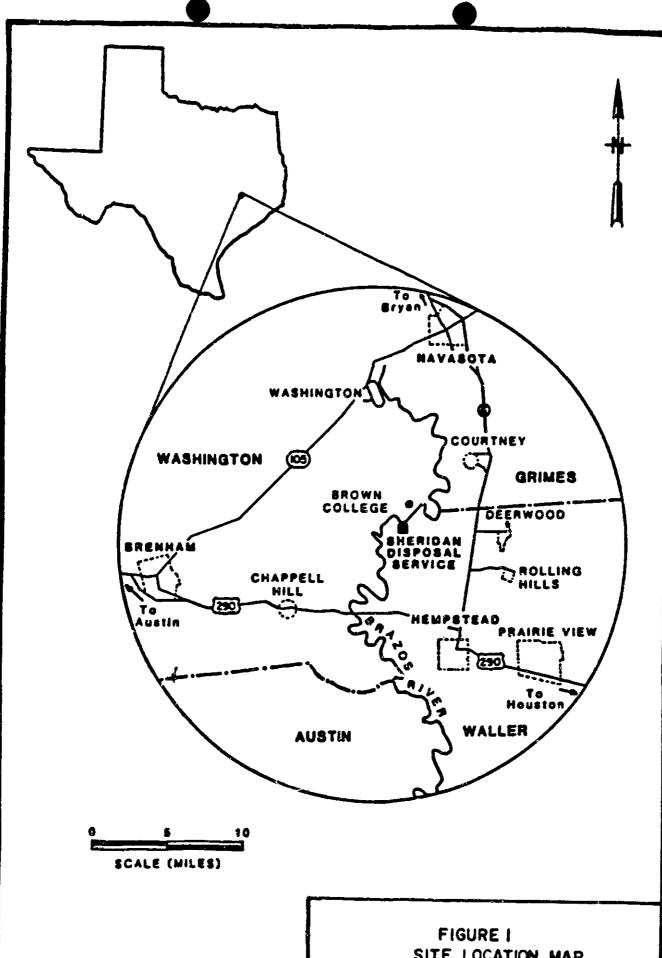
The site is relatively flat, but slopes gently to the south. It lies within the 100-year floodplain of the Brazos River. However, the lagoon dikes have been built up to an elevation above that of the floodplain.

#### II. SITE HISTORY AND ENFORCEMENT

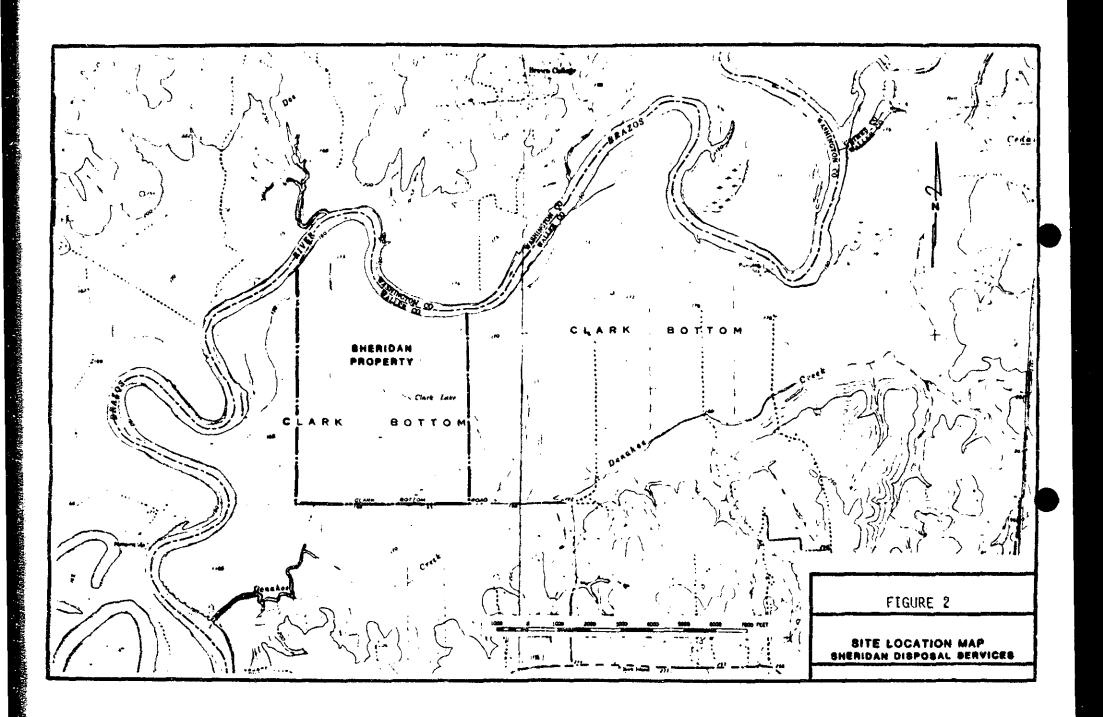
Sheridan Disposal Services operated as a commercial waste disposal facility from about 1958 to 1984. A wide variety of organic and inorganic chemical and solid wastes were disposed of at the site. The facility treated waste by steam distillation, open burning and incineration. The lagoon was developed in a low-lying area of the site and was used as a holding pond, and for the disposal of overflow wastes and waste treatment residues. In 1976, the facility initiated use of the evaporation system for disposal of water which accumulated on the lagoon.

The site's regulatory history began in 1963 when the Texas Water Quality Board (now known as the Texas Water Commission) issued a permit authorizing disposal of industrial solid waste. After permitting, the Texas Water Quality Board (TWQB) received complaints concerning odor, runoff and oil in the Brazos River. The State also noted increased concentrations of contaminants in on-site monitoring wells.

In 1970, the TWQB and Waller County filed suit against the Sheridan facility. After a series of meetings and public hearings, in 1975, a judgement was entered by the Court which prohibited further discharge of wastes into the lagoon. The TWQB and Sheridan Disposal Services discussed numerous closure plans for the lagoon until the TWQB determined that the facility did not have the economic or technical resources necessary to close the lagoon properly. In 1984, the Texas Department of Water Resources (successor of the TWQB) sent letters to generators and transporters of waste managed at the site to notify them of their potential liability under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCIA).



SITE LOCATION MAP SHERIDAN DISPOSAL SERVICE



In response to this notification, the Sheridan Steering Committee, which is now known as the Sheridan Site Committee, organized and began to investigate the extent of contamination at the site. After polychlorinated biphenyls (PCBs) were identified in the lagoon, EPA became directly involved in site closure through the Toxic Substances Control Act. The site was ranked according to the Superfund Hazardous Ranking System and on June 10, 1986, the site was proposed for inclusion on the National Priorities List. The basis for inclusion on the NPL was primarily the volume, toxicity and mobility of contaminants found at the site and ground water contamination resulting from the site.

In June and July of 1986, 102 Notice/Information request letters were sent to site Potentially Responsible Parties (PRPs). During this time, the Sheridan Site Committee submitted a Remedial Investigation to EPA for evaluation. After reviewing this document the Agency determined that additional field investigations would be necessary to obtain adequate information on which to base a ground water remedy decision. However, in order to expedite lagoon cleanup and reduce further leaching into ground water, the site was divided into two operable units, a Source Control unit which was addressed in a previous ROD and the Ground Water Migration Management (GWMM) unit which is addressed in this ROD.

On February 3, 1987, 59 companies who were members of the Sheridan Site Committee entered into an Administrative Order on Consent with EPA to complete both the Source Control and GWMM remedial investigation/feasibility studies (RI/FSs). In 1988, EPA issued a unilateral order to site PRPs to lower the level of water in the lagoon. This action was implemented by the Committee's contractor with EPA oversight.

After the ROD for the Source Control operable unit was issued, additional Notice/ Information request letters were issued and Special Notice letters informing PRPs of the Remedial Design/Remedial Action (RD/RA) Moratorium period were submitted to over 180 TRPs. The Sheridan Site Committee, the Department of Justice (DOJ) and EPA have reached a tentative agreement for Source Control remediation.

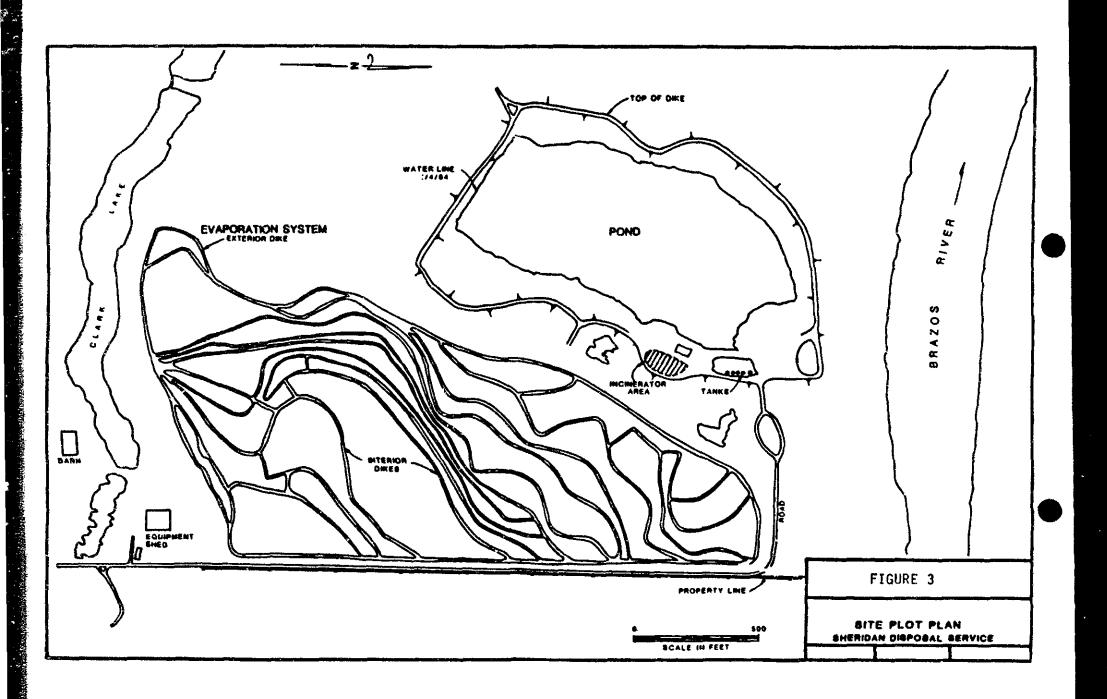
EPA will continue its enforcement activities and send Special Notice Letters to PRPs prior to the initiation of the remedial design of the GMMM operable unit. Should the PRPs decline to conduct future remedial activities, EPA will either take enforcement actions or provide funding for these activities while seaking cost recovery for all EPA-funded response actions from the PRPs.

#### III. HIGHLIGHTS OF COMMUNITY PARTICIPATION

In general, there has been a long history of citizen awareness of the Sheridan Disposal Services site. In the early 1970s when incineration at the site resulted in air emissions, people living within a 7-mile radius complained. In 1971 a citizens' group submitted a petition with over 500 signatures to the Texas Water Quality Board calling for its closure. However, community concerns of either the area residents or local officials are now very low, probably because the site has been inactive since 1984. Also the site is relatively remote and there are no residences within a mile.

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The proposed plan fact sheet announcing the public comment period and opportunity for a public meeting for the ground water portion of the site was distributed on July 31, 1989. The comment period began on August 14, 1989 and ended on September 11, 1989. No one responded to the offer of a public meeting and none was held. No written comments or questions were received by EPA.

#### IV. SCOPE AND ROLE OF OPERABLE UNIT

This ROD describes the remedy selection process for the second operable unit, which is known as the Ground Water Migration Management (GWMM) unit. The function of this operable unit is to prevent potential exposure to contaminated ground water and ensure protective levels are maintained in the Brazos River.

The ROD for the Source Control Operable unit at the site was issued in December 1988. The Source Control ROD addressed the risks associated with exposure to contaminated soils and sludges from the site.

#### V. SITE CHARACTERIZATION

# 5.1 GEOLOGY

The Sheridan site lies on the Brazos River Alluvium of recent age, which is comprised of gravel, sand, silt and clay deposited by the meandering river. The Brazos River Alluvium unconformably overlies the Miocene-aged Fleming formation. The Fleming is made up of interbedded sand and clay layers. Table 1 provides a general description of the hydrogeologic units present in Waller and Austin counties. However, all formations from the Goliad sand to the Beaumont clay are not present beneath the site.

According to the Austin sheet of the <u>Geologic Atlas of Texas</u>, no faults with surface expression occur in the vicinity of the site. Field investigations conducted by the responsible parties' contractor verified this conclusion. The Hockley escarpment and salt dome are found about 18 miles south of the site and the Millican fault zone lies approximately 20 miles to the north. However, there is no evidence that these features influence the hydrogeology of the site.

#### 5.2 HYDROGROLOGY

The alluvium of the Brazos River forms the first Regional aquifer beneath the site. The Evangeline and Jasper aquifers underlie the alluvium. Most wells in the vicinity of the site tap the Evangeline aquifer, which is about 450 feet thick beneath the site.

Figure 4 describes a general cross-section of site hydrogeology. The first water-bearing unit, which is referred to as the shallow aquifer, is identified in the cross-section as Stratum B. This aquifer is part of the sediments of the Brazos River Alluvium. The second water-bearing unit, know as the deep aquifer, is identified as Stratum D. This unit is part of the Evangeline aquifer. The clay layer know as Stratum E lies beneath the confined aquifer at about 100 feet in depth and was the deepest unit investigated at the site.

Table 1
Geologic description and weter-bearing properties of the geologic units forming the equifers is Austin and Haller Counties

Aquifer	Stratigraphic unit	Estimated thickness in area (feet)	General composition in Austin and Waller Chunties	Surface expressions	Nater-bearing properties in Austin and Waller Counties	
Allwiel	Tritutary alluvium and finod-plain alluvium of the Brezos River	Ç- 80	tecommolidated gray, trown, and reddish-brown clay, slit, and sandy clay, commonly overlying light-colored mand or coerer- grained send and gravel.	Occurs along the banks of smaller streams and in the flood plain of the Brazos River. Hastly flet plain. Poms reddish to dark-brown and black soils.	Yields small to large smounts of fresh water in the flood plain of the Brazos River.	
	Bestmont Clay	0- 75	Notited red, rediish-brown, brown and gray, dense clay with white calcurations modules. May contain lenses of fine and sedius- grained mind or sand and gravel in places.	Occurs only along the fringes of the Bracos River Flood plain. Forms mearly flet, mercos plain. Solis are gray to black, blocky.	Fields small to enderste smounts of water to meathered shallow wells less than 100 feet deep along the edge of the Bragos River floor plain.	
	Montgonery Formation	0- 407	light gray to light brown, fine- grained mand, milt, and clay, probably grading with depth to darker-colored consers mand and in places based mand and gravel.	Marly flat, featureless plain; moils are light colored, fine-grained sandy. Occurs only along southern edge of ares.	Yields mail amounts of water to scattered shallow wells.	
Evange) ine	Bentley Formation	O- 507	Niterrati g beds of reddish-brown to yellow and gray, sottled clay interhedued with grayish, fine- to coarse-grained sand and gravel lenses. Scattered lentils of lise-commented sandstone. Clay, sandy clay, and fine much predominate in the upper part, darkst-colored coarser sand and gravel in the lower part.	Forms flat plains in the southern one-third of the counties; most of the rice-growing area is on the outcrop. Forms light-colored sandy loss solis.	Contributes small to moderate smources of freen water to domestic wells in the southern part of the area; probably represented by the uppermost sands acressed in these wells.	
	Willie Sand	G- 2407	Alternating beds of mottled red, yellow, brown, and gray clay and sand with scattered lenses unsorted sand and quartz gravel. Ferroginous mobiles common. Pacted and hard in fresh exposures. Basal part is trushly a hard, gravelly mand and clay.	Forms the gently-rolling sund hills of northern Waller County and control Austin County. Most of the gravel pits in Austin County are in the basal Willis. Forms tan mandy soils.	Yields small to large amounts of fresh water to wells.	
	Colind Sand	0- 6407	White to grey, sticky, calcareous clay with interbedded lenses of light-colored, gravelly sand and lime-commuted sandstons, plack chart grains in the whitish sand give a sait and paper effect.	Occurs as isolated surface exposures because the colied is overlapped by the Willis Sand or is easily removed by erceion forms gray, sticky soils, thumliy occurs along valley bottoms and walls.	Yields large amounts of fresh water to wells.	
	Flaming Focmation	0-1,700	Interhedded clay and mind; clay predominantly in the upper part. The blocky, dense clay is various shades of gray, yallow, olive, and brown. White calcureous modules are common. Wand is gray to brown,	Forms the colling and dissected topography of northern Austin County, Forms gray to black less and sundy loss soils.	Yields smull to large encents of fresh to alightly smallne water.	
Aguiclude			brown, intertedded with gray clay. Sand is section to fine grained and often cross-bedded.			
Janger	Catahoula Stridstons	,	Alternating beds of gray clay, tuff, and eand. Issuer mendo may be hard, white, and have opaline Appacance.	or Waller Counties, Difficult to distinguish from everlying Fluming Formetion in both surrace suposures and in well logs,	May yield small smounts of fresh water in the most northern part of Austin County. Comercity water is at least chighily salars.	
	Undifferentiated	-	Alternating beds of gray mand, sundatons, and shale.	Does not crop out in Austin sc Helier Counties.	Would yield only maline water.	

Source: Texas Water Development Sourd, Report 48

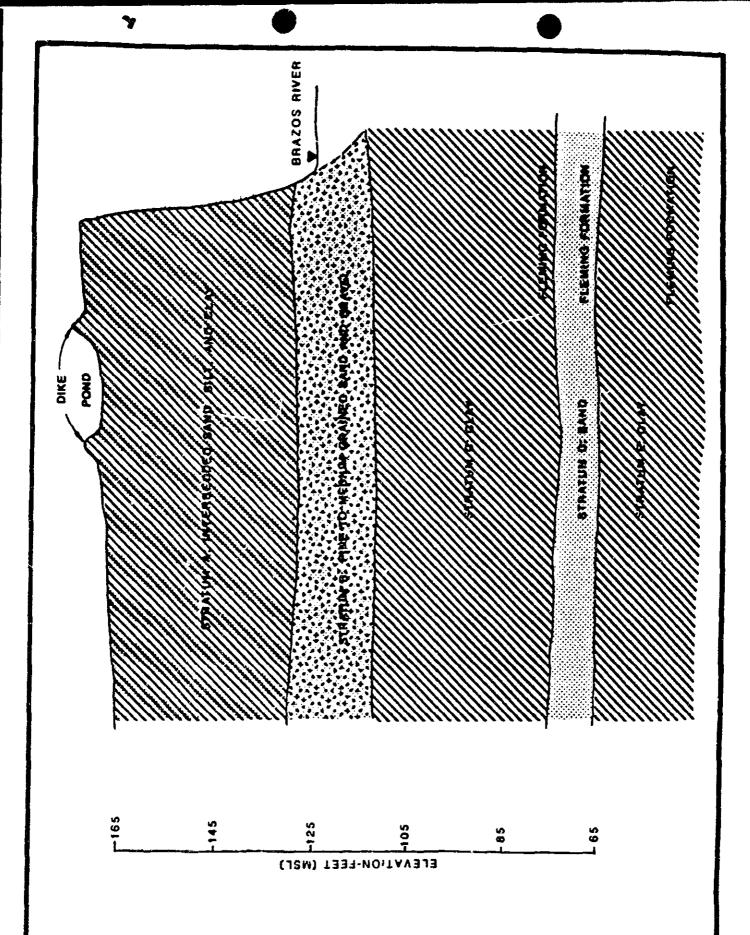


FIGURE 4
GENERAL SCHEMATIC SITE GEOLOGY
SHERIDAN DISPOSAL SERVICE

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Ground water in the water table and confined aquifers generally flows towards the river, in a northwestern direction. However, during high river stage conditions (less than about one third of the time) ground water flow in the water table aquifer may shift to the west and south. The predominant vertical hydraulic gradient is upwards from the confined aquifer towards the water table aquifer.

#### 5.3 SAMPLING RESULTS

#### A. Soil and Sludge

The results of the soil and sludge sampling may be found in the site Source Control RI/FS and risk assessment. Both organic and inorganic (metal) contaminants were detected at the site. The most significant contaminants in terms of toxicity and mobility are PCBs, benzene, toluene and trichloroethylene. A summary of this information is found in EPA's ROD dated December, 1988.

# B. Surface Water

Sampling of the Brazos River downstream and upstream of the site indicated that there was no measureable difference in water quality between the downstream and upstream samples. Sediment samples were also obtained from the river bottom at locations downstream and upstream of the site. Concentrations of organic constituents indicated that the site had not impacted the sediment however, concentrations of metals were slightly higher in the downstream sample than the upstream sample. Analyses of Clark Lake water and sediments do not exhibit elevated levels of site contaminants.

#### C. Ground Water

Over thirty wells have been installed at the site in both the shallow and deep aquifers to determine the extent of contamination and evaluate site hydrogeology. Table 2 shows the highest levels of contaminants detected in the shallow wells to date and Figure 5 illustrates the extent of contamination in the shallow aquifer. No contamination has been detected in the deep aquifer. The only significant group of contaminants identified in the shallow ground water are volatile organics. However, the Maximum Contaminant Level (MCL) for arsenic was exceeded in one well by .01 ppm during one sampling period. The highest concentration of contaminants detected during recent sampling was benzene, at 130 ppb.

### D. Air

Extensive air sampling has been completed at the site. No priority pollutant constituents were detected at concentrations above ambient background levels.

#### VI. SUMMARY OF SITE RISKS

The assessment of risk posed by the Sheridan site was evaluated in the Sheridan Risk Assessment. This assessment examined the amount, concentration, properties, and environmental fate and transport of chemical found at the site; the populations and environments potentially at risk; exposure

Table 2

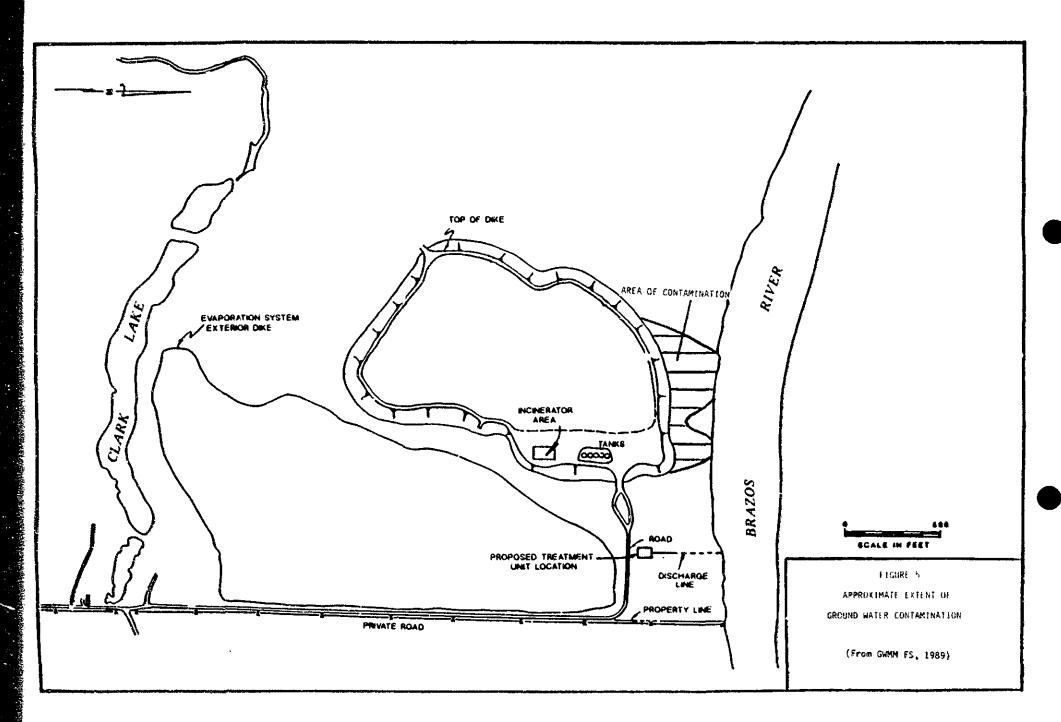
Summary of Highest Levels of Contaminants Detected in Shallow Ground Water for SHERIDAN DISPOSAL SERVICES SITE

Well Number: Sampling Dates:		MW3 6/84	MW12 Upgradient 4/89	MW34 10/87 (4/89)	MW37 10/87 (4/89)	MW38 10/87 (4/89)	MW39 10/87 (4/89)
Contaminant	Units						
Benzene	ррЪ	ND	ND	27 (130)	ND	ND	ND
Tetrachloroethylene	ppb	ND	ND	ND `	13 (18)	21	ND
Trans-1,2 dichloroethylene	ppb	ND	ND	25 (30)	5.2 (6.1)		ND
Trichloroethane	ppb	ND	ND	15 (14)	ND	13 (10)	ND
Chlorodibromomethane	ppb	11	ND	ND	ND	ND `	ND
Chloroform	ppb	60	ND	ND	ND	ND	ND
Dichlorobromethane	ppb	63	ND	ND	ND	ND	ND
1,1,1-trichloroethane	ppb	11	ND	ND	ND	ND	ND
Isophorone	ppb	30	ND	ND	ND	ND	ND
Arsenic	ppb	NA	ND	ND	ND	ND	43 (60)
Copper	ppb	NA	78*	ND	ND	6	8
Selenium	ppb	NA	ND	ND	ND	ND	ND

NO - Not detected, detection limits differ slightly for each sampling event

# NA - Not Analyzed

<sup>\*</sup> Anomolously high levels of copper were detected in upgradient wells in April 1989. Since copper is not a site contaminant and it was found in highest concentrations in upgradient locations distant from the waste areas, it is thought to result from sampling apparatus, off-site hydrocarbon recovery operations, or landowner activities.



pathways; and potential exposure events. The document described the risks associated with current and future (probable and worst-case) exposure scenarios. The numerical cancer risk values discussed below are theoretical quantifications of the excess lifetime cancer risk, that is, the increased probability of contracting cancer as a result of exposure to wastes, compared to the probability if no exposure occurred. For example, a  $10^{-6}$  excess cancer risk represents an exposure that could result in one extra cancer case per million people exposed.

Three scenarios were developed in the site risk assessment. The first scenario evaluated is for current conditions which assume restricted site access and maintenance of the site. The second scenario addresses the risks associated with the most probable future land use conditions. These conditions assume continued agricultural (rangeland) use and unrestricted access to wastes. The third scenario describes the risks associated with the worst-case future scenario of residential development adjacent to the waste areas.

Under current conditions which assume restricted site access and maintenance of the site, the only potentially significant pathway is migration of contaminants into the Brazos River. This pathway was modelled using very conservative assumptions, resulting in an upper bound excess cancer risk from the ingestion of PCBs in fish of 1.5 x  $10^{-5}$  (1.5 excess cancer cases per 100,000 people exposed). Modelling using less conservative assumptions indicated that the 1 x  $10^{-6}$  excess cancer risk would not be exceeded. However, it should be noted that both models assume essentially all of the source will leach into the ground water over time; This is not expected to occur since the majority of contamination will be addressed by the Source Control remedy.

The second scenario evaluated was the most probable future land use which assumed continued agricultural (rangeland) land use and unrestricted access to the waste disposal area. This scenario differs from the first only with regard to exposure to lagoon sludges which is addressed in the Source Control ROD. Therefore, the risks associated with this scenario are identical to the first.

The last scenario evaluated in the Risk Assessment is the worst-case scenario of residential development adjacent to the waste areas. The pathway previously described for the current-use scenario of migration of contaminants into the Brazos River would be similar in the residential scenario. However, an additional exposure pathway of ingestion of contaminated ground water would result in a total excess cancer risk greater than 1 x  $10^{-3}$  as well as a significant non-carcinogenic risk posed by phenol (Hazard Risk  $^1$  of 15). Phenol is potentially the most significant non-carcinogenic contaminant which could could impact ground water.

The preceding paragraphs describe potential impacts to human health. Analyses of water and sediments in the Brazos River indicate that the ground water is not adversely impacting potential environmental receptors in the Brazos River.

<sup>1</sup> The risk for a non-carcinogenic compound is described by a Hazard Index. A hazard index is the ratio of the contaminant concentration to EPA's reference dose for the contaminant. A value greater than one indicates that the ambient concentration of a contaminant is higher than the acceptable reference dose, and may be significant.

The actual or threatened releases of hazardous substances from the site described above, if not addressed by implementing the response action selected in this ROD, may present an imminent and substantial endangerment to public health, welfare, or the environment.

#### VII. ALTERNATIVE EVALUATION

#### 7.1 EVALUATION CRITERIA

In accordance with Section 121 (a), (b), and (d) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCIA), 42 USC Section 9621(a) (b) and (d), EPA has determined that nine factors must be considered in selecting a remedy for a Superfund site. Two of the criteria, Protection of Human Health and the Environment and Consistency with Other Laws, are known as Threshold Criteria which must be met. Long-term Effectiveness and Permanence, Reduction of Toxicity, Mobility, or Volume, Short-term Effectiveness, Implementability and Cost are considered to be Primary Balancing Criteria. Modifying Criteria include State Acceptance and Community Acceptance. These criteria are summarized below:

# A. Overall Protection of Human Health and the Environment

Following the analysis of the remedial options against individual evaluation criteria, the alternatives are assessed from the standpoint of whether they provide adequate protection of human health and the environment.

#### B. Consistency with Other Environmental Laws

In determining appropriate remedial actions at Superfund sites, consideration must be given to the requirements of other Federal and State environmental laws, in addition to CERCIA as amended by SARA. Primary consideration is given to attaining applicable or relevant and appropriate Federal and State public health and environmental laws and regulations and standards. Not al! Federal and State environmental laws and regulations are applicable to each Superfi d response action. The compliance of each remedial alternative with all applicable or relevant and appropriate environmental laws is discussed in Appendix C.

#### C. Long-term Effectiveness and Permanence

Alternatives are assessed for the long-term effectiveness and permanence they afford along with the degree of certainty that the remedy will prove successful. Factors considered are:

- o Magnitude of residual risks in terms of amounts and concentrations of wastes remaining following implementation of a remedial action, considering the persistence, toxicity, mobility, and propensity for bioaccumulation of such hazardous substances and their constituents;
- o type and degree of long-term management required, including monitoring and operation and maintenance;
- o potential for exposure of human and environmental receptors to remaining waste considering the potential threat to human health and the environment associated with excavation, transportation, redisposal, or containment:

- o long-term reliability of the engineering and institutional controls, including uncertainties associated with the land disposal of untreated wastes and residuals; and
- o potential need for replacement of the remedy.

# D. Reduction of Toxicity, Mobility or Volume

The degree to which alternatives employ treatment that reduces toxicity, mobility or volume must be assessed. Relevant factors include:

- o the treatment processes the proposed solutions employed and materials they treat;
- o the amount of contaminated materials that will be destroyed or treated;
- o the degree of expected reduction in toxicity, mobility, or volume;
- o the residuals that will remain following treatment, considering the persistence, toxicity, mobility, and propensity for bioaccumulation of such hazardous substances and their constituents.

#### E. Short-term Effectiveness

The short-term effectiveness of an alternative must be assessed considering the following:

- o Magnitude of reduction of existing risks; and
- o short-term risks that might be posed to the community, workers, or the environment during the implementation of an alternative including potential threats to human health or the environment associated with excavation, transportation, and redisposal or containment.

# F. Implementability

The ease or difficulty of implementing the alternatives are assessed by considering the following factors;

- o Degree of difficulty associated with constructing the solution;
- o expected operational reliability of the treatment technology;
- o need to coordinate with and obtain necessary approvals and permits (or meet the intent of any permit in the case of Superfund actions);
- o availability of necessary equipment and specialists; and
- o available capacity and location of needed treatment, storage, and disposal services.

#### G. Cost

The types of costs that should be assessed include the following:

- o Capital costs;
- o operation and maintenance costs;
- o net present value of capital and operation and maintenance cost; and
- o potential future remedial action costs.
- H. State Acceptance (through the Texas Water Commission)

Evaluation includes assessment of:

- o Components of remedial alternatives that the State supports;
- o features of the alternatives about which the State has reservations; and
- o elements of the alternatives which the State strongly opposes.

#### I. Community Acceptance

This assessment should evaluate:

- o Components of remedial alternatives that the community supports;
- o features of the alternatives about which the community has reservations; and
- o elements of the alternatives which the community strongly opposes.

EPA is also directed by SARA to give preference to solutions that utilize treatment to remove contaminants from the environment. Offsite transport and disposal without treatment is the least preferred option where practicable treatment technologies are available.

#### 7.2 DESCRIPTION OF ALTERNATIVES

In conformance with the National Contingency Plan (NCP), initial remedial approaches were screened to determine which might be appropriate for this site (see the Sheridan Disposal Services GWMM Feasibility Study for details of this evaluation). From these possible remedies, three were chosen for more detailed evaluation and comparison with the remedy selection criteria outlined above. In addition, "No Action" was evaluated to comply with the requirements of the NCP. Each remedy is summarized below.

All of the alternatives have some parts in common. They all require ground water monitoring to track the position of the plume of contamination. Additionally, all alternatives include the use of institutional controls to prevent the use of contaminated ground water. Finally, in the two alternatives which involve ground water treatment, ground water will be treated to meet ARARs and discharged into the Brazos River.

### Alternative 1 - Natural Attenuation

This alternative relies on lowering contaminant concentration through natural processes such as sorption, dispersion and biodegradation. Surface water monitoring in the Brazos River will also be conducted to ensure that protective levels are maintained in the river. It will require a minimum of thirty years for contaminants at the upgradient edge of the plume to move through the hydrogeologic system. The cost of this alternative is approximately \$326,000.

# Alternative 2 - Partial Slurry Wall with Ground Water Treatment

This alternative involves the construction of a 65 foot deep low permeability slurry wall at the downgradient edge of the contamination plume (Figure 6). The slurry wall will intercept contaminated ground water and channel it towards extraction wells located at the center and ends of the slurry wall. Contaminants in the extracted ground water will be treated onsite by passage through a granulated activated carbon (GAC). It is expected to take approximately 25 years for ground water at the upgradient edge of the plume to reach the slurry wall for recovery and treatment. The cost of this alternative is approximately \$4.2 million dollars.

# Alternative 3 - Recovery Wells with Ground Water Treatment

This alternative involves placement of a line of wells near the downgradient edge of the contamination plume (Figure 7). Ground water will be extracted by these wells and treated onsite by passage through GAC. It is expected to take about 25 years for contaminated ground water at the far edge of the plume to be recovered by the wells and treated. The cost of this alternative is estimated to be about \$5.3 million dollars.

It should be noted that the cleanup timeframes described for the alternatives described above are based on the time necessary to move one pore volume of contaminated ground water through the aquifer and do not account for desorption of contaminants bound to the aquifer. These timeframes will be considerable longer (i.e., 90 years) since additional pore volumes of ground water are expected to be necessary to remove contaminants bound to the aquifer.

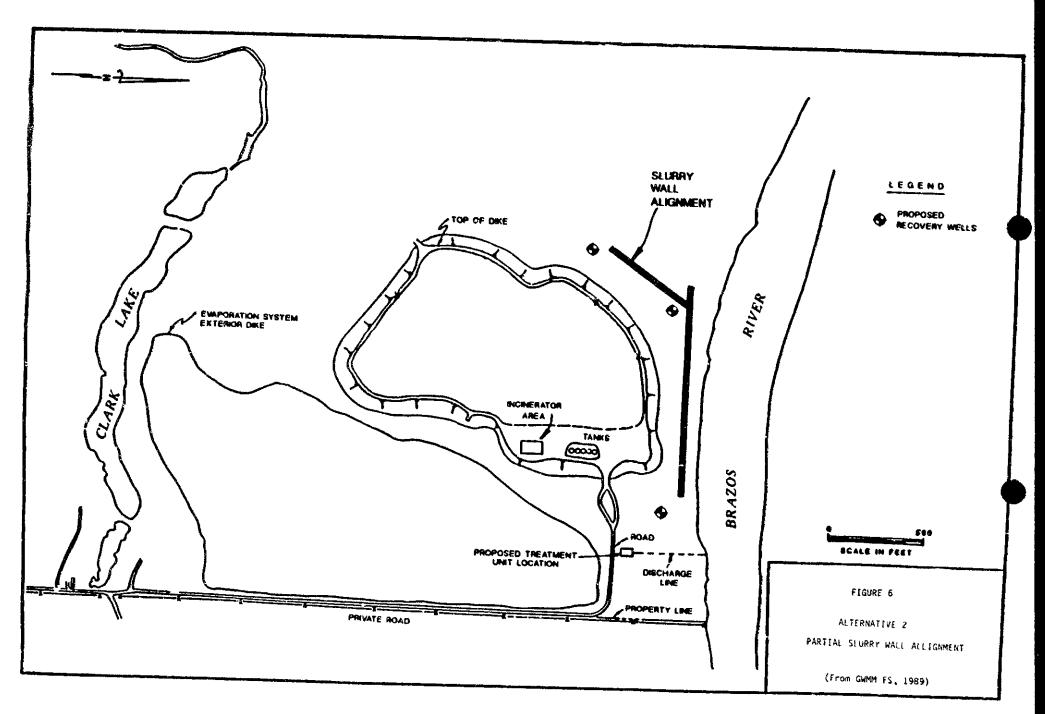
# Alternative 4 - No Action

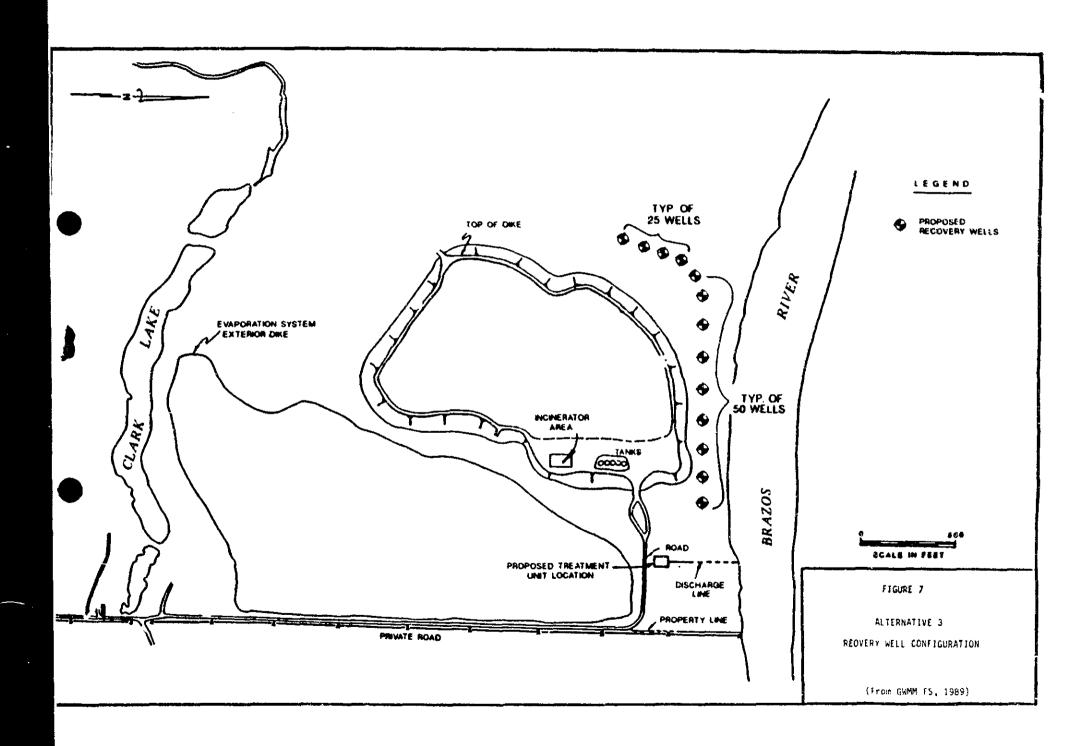
The No Action alternative does not provide for  $\epsilon$  capital improvements or other activities to address the ground water contamination. With no action, potential exposure to contaminated ground water is not prevented and potential impacts on the river not controlled. However, Superfund regulations require that this alternative be evaluated as a basis for comparison to other alternatives.

#### 7.3 EVALUATION OF ALITERNATIVES

The following values were assigned to compare remedial selection criteria:

- "+" Alternative should exceed a criterion in comparison to other alternatives.
- "." Alternative should meet the selection criterion.
- "-" Alternative will not meet a criterion, or will not meet a criterion as well as other alternatives.





The rationale for the ratings assigned each alternative is presented in the following subsections.

# A. <u>Compliance with Applicable or Relevant Appropriate Requirements (ARARs) of</u> <u>Other Laws</u>

The No Action Alternative is accorded a rating of "-" due to the inability to monitor the ground water and determine whether ARARs are continuing to be met for the long term. The Alternatives 1, 2, and 3 all meet ARARs and are rated "."

# B. Reduction of Mobility, Toxicity and Volume

The processes of natural attenuation such as biodegradation, sorption and dispersion, may reduce the toxicity mobility and volume of waste constituents For this reason, Alternatives 1 and 4 are ranked ".". The alternatives which involve ground water recovery (Alternatives 2 and 3) include ground water treatment and thus reduce the mobility, toxicity and volume of the ground water. These alternatives are given a rating of "+". However, it should be noted that at the design flow rate and composition of the treatment scheme proposed for Alternatives 2 and 3, less than eight pounds of total contaminants would be removed in the first year and this quantity would very likely decrease with time.

# C. Long-Term Effectiveness and Permanence

The No Action alternative is ranked "-" due to the inability to monitor whether ARARs are continuing to be met or prevent the use of contaminated ground water for the long term. In the long-term, the concentrations of constituents will be reduced by natural processes, therefore Alternative 1 is accorded a ranking of ".". Alternatives 2 and 3 will be slightly more effective at reducing the concentrations of constituents in the long-term. Therefore, both 2 and 3 are rated "+".

#### D. Short-Term Effectiveness

The No Action alternative is ranked "-" due to the inability to prevent ground water use before attenuation takes place. The Natural Attenuation Alternative, for the short-term, is equally effective as Alternatives 2 and 3 since the institution of controls will prevent exposure to contaminated ground water. For this reason, Alternative 1 is ranked ".". However, alternatives 2 and 3 will cause onsite workers to be exposed to additional potential risk since these alternatives include active construction and operation activities. Therefore, Alternatives 2 and 3 are ranked "-".

#### E. <u>Implementability</u>

Alternative 1 and 4 would be the most easily implemented and are rated "+". Between the remaining alternatives, Alternative 3 is more easily implemented than 2. Alternative 3 is rated ".", since it requires construction of wells and a treatment plant. Alternative 2, partial slurry wall with ground water treatment, is rated "-" due to the difficulties in constructing a slurry wall considering the site constraints. Site constraints include a narrow strip of land for access, the fact that a trench of 65' depth is beyond the

14820

reach of normal trenching equipment and a new working "bench" would need to

#### Cost

be constructed.

Table 3 summarizes the cost of the alternatives as developed in detail in Section 6.3 and Appendix C of the feasibility study. Costs are presented as capital, operation and maintenance, present value and total cost. The No Action and Natural Attenuation alternatives (4 and 1) are the least costly alternat and are both ranked "+". Alternative 2 is intermediate in terms of cost and is rated ".". Alternative 3 is the most costly alternative and is therefore rated "-".

# Overall Protection of Human Health and the Environment

The No Action alternative is ranked "-" due to the inability to prevent potential use of affected ground water and lack of monitoring. Alternative 1 is ranked "." since the seepage of ground water into the Brazos River under current and projected future conditions will result in concentration levels which are protective of human health and the environment. In addition, institutional controls would effectively prevent use of the affected ground water. Alternatives 2 and 3 are equivalent to Alternative 1 in terms of overall protection of human health and the environment and are therefore rated ".". The reasons for this ranking are discussed below:

The shallow ground water recovery rate is relatively low, therefore withdrawal of one pore volume of ground water will require about 25 years. Since extraction of multiple pore volumes would probably be necessary to achieve drinking water criteria (MCIs), it is anticipated that treatment would continue for some multiple of 25 years. During this relatively long time period, the shallow ground water would not meet drinking water criteria and could not be used as such. Institutional controls would be maintained for this period to prevent potable use of the shallow aquifer. Therefore, Alternatives 1, 2 and 3 all require long-term institutional controls to prevent use of the shallow aquifer.

#### Community Acceptance

The community has voiced limited support for the Natural Attenuation alternative and has not expressed any concerns about the alternative. Therefore natural attenuation is rated "+" and all other alternatives are rated ".".

#### State Acceptance

The State of Texas, through the Texas Water Commission, has indicated that they have no objection to the selected alternative. Therefore, Natural Attenuation is rated "+" and all remaining alternatives are rated "0".

#### Summary of Comparative Analysis

As described above, alternatives 1, 2 and 3 are fully protective of public health and the environment. All of the alternatives except No Action could also be implemented to comply with all ARARs. With regard to the balancing

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TABLE 3

# Alternative Costs (in thousands)

	Alternative	Capital Cost	Operation and Maintenance	Present Value Cost	Total Cost
1.	Natural Attenuation	-0-	\$326	\$194	\$326
2.	Partial Slurry Wall with Ground Water Treatment	\$850	\$3,346	\$2,428	\$4,196
3.	Recovery Wells with Ground Water Treatment	\$1,095	<b>\$4,2</b> 34	\$3,073	\$5,329
4.	No Action	<b>-</b> 0-	-0-	-0-	<b>~0-</b>

criteria, alternatives 2 and 3, make a slight reduction of toxicity of the affected ground water, but the reduction is very small, and the resulting decrease in surface water concentrations would not be detectable. Furthermore, these alternatives concentrate waste constituents on CAC, which must eventually be disposed of. The more costly alternatives (Alternatives 2 and 3), are generally more difficult to implement and may pose more short-term risks to onsite workers. Finally, Alternatives 2 and 3 will not appreciably decrease the time necessary to achieve MCLs.

#### VIII. SELECTED REMEDY

Based on the information provided in the administrative record and the results of the evaluation of alternatives (Section 5.3), the "final" remedy has been selected. It is EPA's judgement that Alternative 1, Natural Attenuation, best satisfies both the statutory and selection criteria in comparison to the other alternatives evaluated in this document. This remedy is consistent with the remedy selected for the Source Control operable unit.

#### 8.1 DESCRIPTION OF SELECTED REMEDY

A. Establish Alternate Concentration Limits (ACLs) as the Ground Water Protection Standard

EPA has selected ACLs as the appropriate ground water standard for the site as long as the conditions set forth below remain valid. ACLs are ground water protection standards that are used to assure that hazardous constituents found in the ground water do not pose a risk to human health or the environment. To ensure that ACLs remain protective, the following conditions must continue to be met at the site:

- a. The Brazos River must remain the discharge point for ground water from the site.
- b. The Brazos River cannot be adversely impacted by the discharge of contaminated ground water into the river. Presently, no adverse impacts to the river from the site have been observed. To ensure that future adverse impacts from the site do not occur at the point of exposure for environmental receptors in the river, river water will be sampled to ensure that there is no statistically significant increase in contamination, as compared to upgradient locations.
- c. The ground water use restrictions outlined below must be implemented and continued to ensure that affected ground water is not consumed and the integrity of the Brazos River as a hydraulic barrier to ground water flow is maintained.

If any of these conditions change, the situation will be reevaluated and appropriate action taken. The specific provisions for setting the ACLs are outlined below.

#### ACL Contaminants and Concentrations

EPA has set ACLs for the contaminants detected in the ground water in order meet drinking water criteria in the Brazos river. These values were calculated by determining the volume of affected water entering the river at any time and factoring in the dilution which would occur in the river at historical low flow conditions.

#### These ACLs are listed below:

ACL (ppm)
26
41
26
26
260

If additional contaminants are detected in the ground water in the future, ACLs will be developed for them using the methodology described in the F.S.

# Point of Compliance

The point of compliance is the location where ACIs must be met and is also the well location where ACIs are monitored. At the point of compliance, ACIs will be met at concentrations that ensure that human health and the environment are protected at the point of exposure and that no statistically significant increase in contamination occurs in the river.

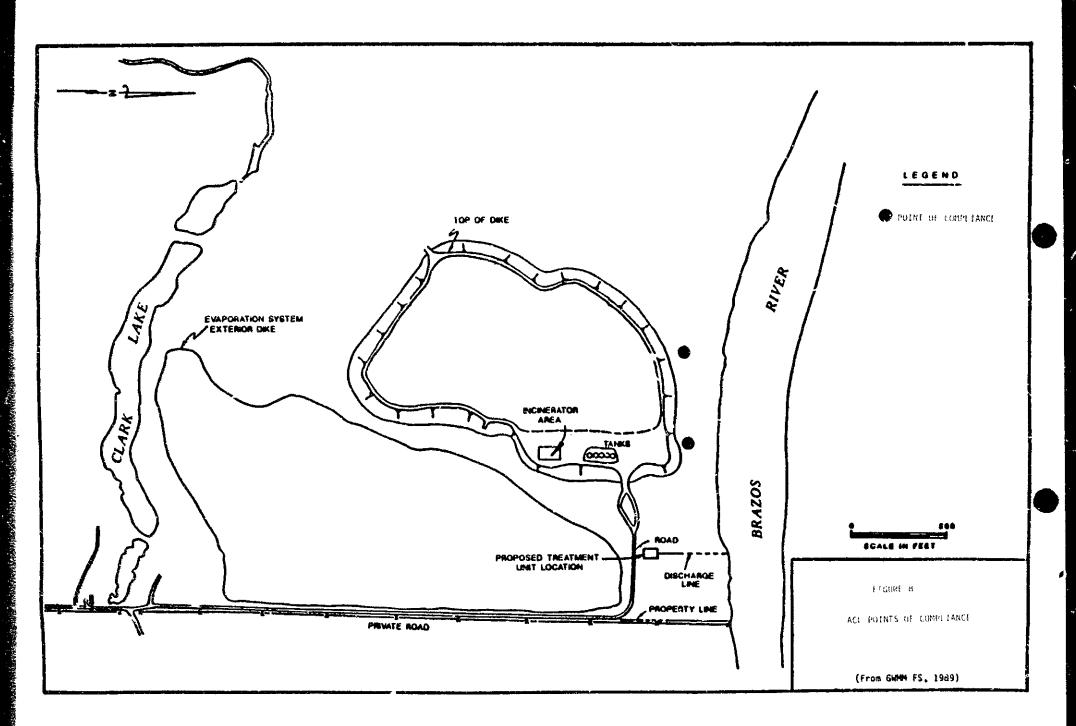
The specific locations for the point of compliance monitoring, based on the existing position of the ground water plume, are around the boundary of the lagoon and are designated as well numbers 34 and 35 as illustrated in Figure 8. If the plume position changes additional compliance points may be identified.

#### Point of Exposure

A point of exposure is a location where environmental or human receptors may be exposed to or use ground water. Exposure to ground water at that point cannot result in an endangerment to human health or the environment. At the Sheridan site, the point of exposure will be the interface of ground water and the Brazos River (i.e., where offered ground water comes into contact with the river). It will be monitored by the collection of water samples from the Brazos River at the projected point, or points of entry of affected ground water from the site.

# Ground Water Use Restrictions

Ground water use at the site will be restricted to ensure that contaminated ground water is not consumed and that the hydraulic barrier that the Brazos River provides is not affected. Ground water use onsite will be restricted within a minimum of 100 feet from the edge of the plume of contaminated ground water. In addition, the use of any well (other than that employed as part of a corrective action) which could potentially affect the size or position of the plume of ground water contamination is prohibited.



The ground water use restrictions which will be implemented are deed notices recorded in the county clerks office. These restrictions are expected to be reliable and effective for the following reasons.

- 1. The area of attainment (ground water contamination plume exclusive of the area beneath the lagoon) is limited to a narrow strip of land between the waste lagoon and the river, and is located entirely onsite, on the land owner/former operator's property.
- 2. The yield of the aquifer is too low to be of agricultural use, which is the most likely potential use.
- 3. The land owner/former operator is a signatory to a proposed Consent Decree which states that he will not take any actions at the site without getting prior written Consent from EPA. In addition, the terms of any sale of the site property must contain a provision requiring compliance with the consent decree.
- 4. There will be, at the minimum, annual monitoring of site conditions to verify that the restrictions are effective.

EPA has enforcement authority to ensure that the remedy selections for the source control and GWMM operable units are implemented and that no one interferes with remedy implementation. If any of the conditions listed above should change, the existing situation will be evaluated and appropriate action will be taken to prevent potential use of contaminated ground water.

# Ground Water Monitoring

Ground water will be monitored to ensure compliance with ACIs and the three conditions listed at the beginning of Section 8.1. Compliance monitoring will be conducted quarterly for the first year. The frequency of monitoring may then be modified by EPA.

The first time an ACL for a particular contaminant is exceeded, the well will be resampled. If the second analysis confirms that the ACLs are being exceeded, EPA will determine whether the corrective action program outlined below will be implemented.

Finally, additional wells will be monitored quarterly to ensure that the Brazos River continues to act as a discharge point and hydrological barrier to ground water flow. The monitoring frequency of these wells may be modified by EPA.

#### Surface Water Monitoring

The surface water from the Brazos River will be monitored to ensure that there is no statistically significant increase in contamination due to the ground water recharge to the River. Samples will be obtained in the river immediately adjacent of the point of projected entry of effected ground water and upgradient of the site.

B. Corrective Action and Contingency Planning

In the event ACIs are exceeded, if any of the three conditions outlined at the beginning of section 8.1.A. are not met, or if changes in receptors

40 C.F.R. §264.100 will be implemented. As part of the design of the remedial action, a corrective action contingency plan will be developed. Under the corrective action program, contaminated ground water will be extracted and treated, or other necessary and appropriate action will be undertaken, to reduce contaminant levels to ensure that ACIs are not exceeded at the compliance point and that the remedy is protective of human health and the environment at the point of exposure.

If ground water needs to be treated at the site, different process options, including a combination of treatment technologies, will be considered during the design of the treatment system. The process presented in the FS for the pump and treat alternatives is one possible process configuration that could be utilized. During design of the treatment system, the particular tecology or technologies will be chosen on the basis of performance goals that EPA sets for the treatment system.

# C. Monitoring, Operation and Maintenance (MOM)

- 1. The site will be secured to meet the requirements of 40 C.F.R. §264.14 during post-closure.
- 2. The ground water monitoring system will be monitored and maintained to comply with the requirements of 40 C.F.R. Part 264, Subpart F.
- 3. A written MOM plan will be developed to define the activities which will be necessary to ensure the remedy will continue to be effective.

Additionally, because hazardous substances will remain on-site, EPA will reevaluate this site at least once every five years after the commencement of the remedial action to assure that human health and the environment continue to be protected.

#### 8.2. RATIONALE FOR SELECTION OF THE REMEDY

In accordance with Section 121 of CERCIA, to be considered as a candidate for selection, an alternative must be protective of human health and the environment and attain ARARs. For ground water, attainment of ARARs requires that a ground water protection standard be set at either Maximum Contaminant Levels (MCIs), ACIs or at background levels. To meet the ground water protection standards, both pump and treat and natural attenuation alternatives were evaluated.

Because Alternative #4, No-action, is not protective and does not attain ARARs, it was rejected from further consideration.

The remaining three alternatives, which utilize natural attenuation or ground water recovery and treatment, all meet the statutory threshold criteria of protectiveness and attainment of ARARs. To select among them, EPA focused on other criteria, including: snort-term effectiveness, long-term effectiveness, implementability, reduction of mobility, toxicity or volume of waste, community acceptance and State acceptance.

The advantages of the ground water recovery and treatment alternatives is that they will achieve safe levels more quickly and utilize treatment to permanently

14827

16 reduce the toxicity of contaminants. However, the magnitude of these potential benefits is quite small; the cleanup timeframes are estimated to be about 10-15% (i.e., 75 vs. 90 years) faster than for natural attenuation, and a maximum of eight pounds per year of total contaminants will be treated annually by sorption onto GAC. The first disadvantage of the ground water recovery and treatment alternatives (Alternatives 2 and 3) is that their operation and maintenance poses greater potential short-term risk to on-site workers during construction and operation of the extraction and treatment systems. Second, Alternative 3 (recovery wells), and to an even greater extent alternative 2 (partial slurry wall), are more difficult to implement than natural attenuation. Third, the costs of alternatives 2 and 3 are between ten and twenty times greater than the costs of natural attenuation. Finally, the State and the community have expressed limited support of the natural attenuation alternative. In light of these considerations, EPA has determined that Alternative 1, Natural Attenuation, best satisfies  $\infty$ the nine criteria for remedy selection. S As discussed in the description of the Selected Remedy, the natural attenuation alternative requires the implementation and enforcement of ACIs as the appropriate ground water protection standard for ground water in the area of attainment. The rationale for selection of this standard is described in the paragraphs which follow. Under RCRA regulations, the ground water protection standard establishes a safe level of contamination in ground water in the vicinity of a waste disposal site. Under these regulations, the protection standard can be set at MCIs, ACLs, or at background levels. ACLs are based on the premise that, although ground water is contaminated around a waste disposal site, at a point where a potential receptor may come into contact with ground water, levels of contaminants are not found at unsafe levels. At locations where exposure to ground water may not be safe, enforceable controls to prevent exposure may be implemented. At the Sheridan site, that basic premise is satisfied. Ground water around the site is contaminated, however, the river and other site features contain and attenuate contamination in the ground water to protective levels and enforceable controls can be implemented. In addition to the RCRA requirements, under Section 121(d)(2)(B)(ii) of CERCIA, 42 U.S.C. §9612(d)(2)(ii), EPA may not establish ACLs as the ground water protection standard for a Superfund site if human exposure to hazardous constituents will occur beyond the site boundary (as that boundary is defined in the RI/FS), unless EPA had determined that: there are known or projected points where the ground water will enter into the surface water: b. there is or will be no statistically significant increase in the level of hazardous constituents in the surface water at the points of entry of contaminated ground water into the river. c. the remedial action includes enforceable remedial measures to preclude human exposure to ground water between the site boundary and all known or projected points of entry.

The RCRA requirements and the CERCIA prerequisites for an ACL are met at the Sheridan site because of the following reasons:

- 1. The ground water characterization study completed in the RI concluded the Brazos River is a hydraulic barrier. Contaminated ground water from the site discharges into the river. Thus, there are known or projected points where site ground water will enter into the river.
- 2. Sampling and analysis conducted by EPA indicates that the Brazos River acts as a hydrologic barrier that will tend to dilute and disperse contaminants. Sampling also indicates that there is no statistically significant increase in hazardous constituents in the river which can be attributed to the site.
- 3. Ground water that is contaminated by the site is not currently used as a source of drinking water. Deed recording, when applied in conjunction with the assumptions described in Subsection 6.1.A., will be used to ensure that contaminated ground water is not consumed.
- 4. Because the impermeable cap required by the Source Control ROD will prevent infiltration of rainwater into the waste lagoon, flushing of lagoon contaminants into ground water will be significantly decreased in the long-term.
- 5. The setting of ACIs for individual contaminants at the points of compliance will ensure that human and environmental receptors are not exposed to unsafe levels of contaminants at the points of exposure. In the event an ACI for an individual contaminant is exceeded, corrective action at the site will be implemented consistent with Section 6.1. Thus, setting ACIs provides EPA with an enforceable mechanism that sets into motion corrective action.

ACLS will be effective and protective of human health and the environment in the long-term. Although the development of ACLS as the ground water protection standard will not reduce contaminants in ground water, their enforcement will ensure protection of public health and the environment at each and every point of exposure. Further, the corrective action program will ensure that the remedy continues to be effective.

Alternatives 2 and 3 which call for pumping and treating ground water, are no more protective than the selected remedy because they will still require the implementation of controls to prevent the use of ground water until safe levels are met. Furthermore, site conditions may prevent the attainment of MCIs within a reasonable timeframe. These conditions include 1) the potential for continued leaching of contaminants sorbed to the aquifer (particularly clay layers) 2) the low hydraulic gradient across the site and the potential that capping the lagoon area as required by the Source Control ROD may further reduce these gradients, and 3) the low yield and small radii of influence of pumping wells in the affected aquifer. In view of these conditions, EPA has determined that cleanup to MCIs is not practicable. Therefore, the development and enforcement of ACIs is necessary. However, pumping and treating ground water may be implemented under the corrective action plan to ensure that ACIs are not exceeded.

#### IX. STATUTORY DETERMINATIONS

Under its legal authorities, EPA's primary responsibility at Superfund sites is to undertake remedial actions which are protective of human health and the

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environment. In addition, Section 121 of CERCIA established several other statutory requirements and preferences. These specify that when complete, the selected remedial action for this site must comply with applicable or relevant and appropriate environmental standards established under Federal and State environmental laws unless a statutory waiver is justified. The selected remedy also must be cost-effective and utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable. Finally, the statute includes a preference for remedies that employ treatment that permanently and significantly reduce the volume, toxicity, or mobility of hazardous wastes as their principal element.

#### 9.1 PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT

The selected remedy protects human health and the environment through the implementation of ground water use restrictions on-site and the enforcement of ACIs to ensure safe levels are maintained at the first point of potential exposure in the Brazos River. The implementation of the selected remedy will effectively reduce any potential excess cancer risk associated with ingestion of contaminated ground water.

## 9.2 COMPLIANCE WITH APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)

The selected remedy will attain all applicable or relevant and appropriate federal and state environmental requirements at the site. Federal environmental laws that are applicable or relevant and appropriate to the selected remedial action at the site include the:

- Resource Conservation and Recovery Act (RCRA);
- Clean Water Act (CWA);
- Safe Drinking Water Act (SDWA); and
- Executive Order 11988 (Floodplain Management)

State environmental laws that are applicable or relevant and appropriate to the selected remedial action at the site are:

- Texas Clean Air Act; and
- Texas Administrative Code Relating to State Water Quality Standard

A discussion of ! w the selected remedy meets those requirements follows.

#### Ground Water

RCRA ground water protection standards (GWPS), 40 C.F.R. Part 264. Subpart F, are established for constituents entering ground water from a regulated hazardous waste unit. Although RCRA is not applicable to the Sheridan site, the waste lagoon presents problems that are similar to those that the requirements address, and thus, the requirements are relevant and appropriate. Ground water protection standards under the RCRA regulations are set at MCIs, ACIs, or at background levels. Because the Brazos River acts as a hydrologic barrier for site ground water, EPA has determined that ACIs are the relevant and appropriate standards at the site. If hydrogeologic conditions at the site change significantly and contaminated ground water was to no longer discharge to the Brazos then MCIs, promulgated pursuant to the Safe Drinking Water Act, are ARARs. These standards

are relevant and appropriate for ground water at the point where exposure to ground water may occur.

## Surface Water

The reach of the Brazos River adjacent to the site is classified by the State as suitable for public water supply and recreational use. Therefore, MCIs and State and Federal Water Quality Criteria promulgated pursuant to the Clean Water Act are relevant and appropriate in the Brazos River. Further, all actions will meet the applicable requirements of 31 Texas Administrative Code Sections 329, 21-29, 307.1 to 307.10. Finally, if corrective action is required, all discharges will be treated to satisfy the requirements of the Clean Water Act application of best available technology (B+1) and hest conventional technology (BCT).

## Air

If a corrective action is required, the treatment facility will be designed to meet the requirements of Section 4.01 of the Texas Clean Air Act.

## Post-Closure Care

Monitoring of ground water will be conducted in accordance with the relevant and appropriate RCRA ground water monitoring requirements under 40 CFR Part 264, Subpart F. In addition, site reviews will be conducted at least once every five years to ensure that the remedy is continuing to be protective of human health and the environment.

## Corrective Action and Contingency Planning

If a ground water corrective action becomes necessary then these activities will be conducted in accordance with the corrective action regulations 40 CFR Section 264.100. Such action will also be conducted in accordance with any relevant and appropriate requirements of the general facility standards in 40 CFR part 264, Subpart B.

### 9.3 COST-EFFECTIVENESS

The selected remedy is cost-effective because it has been determined to provide overall effectiveness proportional to its costs, the net present worth value being \$194,000. It is the least costly alternative which is fully protective of human health and the environment and attains ARARs.

9.4 UTILIZATION OF PERMANENT SOLUTIONS AND ALITERNATIVE TREATMENT TECHNOLOGIES (OR RESOURCE RECOVERY TECHNOLOGIES) TO THE MAXIMUM EXTENT PRACTICABLE

EPA has determined that the selected remedy represents the maximum extent to which permanent solutions and treatment technologies can be utilized in a cost-effective manner for the GWMM operable unit at the site. Of those alternatives that are protective of human health and the environment and comply with ARARS, EPA has determined that the natural attenuation alternative provides the best balance of tradeoffs in terms of balancing and modifying criteria for remedy selection. As described in section 6.2, it is not practicable to treat ground

water because pumping and treating the ground water will not appreciably decrease the cleanup timeframes compared to natural attenuation. Further, attaining drinking water standards in, for example, 75 years, is highly unlikely due to site-specific hydrogeological conditions which include low ground water flow velocities and the presence of numerous clay strata which may act as a continuing source of contaminants to ground water.

#### 9.5 PREFERENCE FOR TREATMENT AS A PRINCIPAL ELEMENT

The operable unit does not utilize treatment to address the principal threat posed by the contaminated water because the implementation of treatment alternatives was found to not be practicable, due to site-specific constraints. However, the Source Control ROD utilizes treatment to address contaminated soils and sludges which act as a source of contaminants to ground water. The quantity of contaminants which could potentially be treated in ground water (a maximum of 8 pounds per year) is very small when compared to approximately 500,000 pounds of contaminants which will be treated as part of the source control remedy.

#### X. DOCUMENTATION OF NO SIGNIFICANT CHANGES

EPA issued a Proposed Plan (preferred alternative) for remediation of the site on July 31, 1989. The selected remedy does not differ from the Proposed Plan.

# SHERIDAN DISPOSAL SERVICES COMMUNITY RELATIONS RESPONSIVENESS SUMMARY

This Community Relations Responsiveness Summary has been prepared to provide written responses to comments submitted regarding the proposed plan of action for the ground water portion of the Sheridan Disposal Services hazardous waste site. The Summary is divided into two sections:

Section I. <u>Background of Community Involvement and Concerns</u>. This section provides a brief history of community interest and concerns raised during the remedial planning activities at the Sheridan site.

Section II. <u>Summary of Major Comments Received</u>. Any written or oral comments are summarized and FPA's responses are provided.

## I. Background

In general, there has been a long history of citizen awareness of the Sheridan Disposal Services site. In the early 1970s when incineration at the site resulted in air emissions, people living within a 7-mile radius complained. In 1971 a citizens' group submitted a petition with over 500 signatures to the Texas Water Quality Board calling for its closure. However, community concerns of either the area residents or local officials are now very low, probably because the site has been inactive since 1984. Also the site is relatively remote and there are no residences within a mile.

## II. Summary of Major Comments Received

The proposed plan fact sheet announcing the public comment period and opportunity for a public meeting for the ground water portion of the site was distributed on July 31, 1989. The comment period began on August 14, 1989 and ended on September 11, 1989. No one responded to the offer of a public meeting and none was held. No written comments or questions were received by EPA.

## FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER: TXD 062132147

INDEX DATE:

09/28/89

#### FINAL.

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

DOCUMENT DATE:

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NUMBER OF PAGES:

075

AUTHOR:

Mark J. White, Attorney

COMPANY/AGENCY:

Sheridan Site Committee, Baker & Botts

RECIPIENT:

John Wheeler, Occidental Chemical Corporation

DOCUMENT TYPE:

Correspondence and Attachments

DOCUMENT TITLE:

Re: Documentation linking Occidental to Diamond Shamrock. thus to the Sheridan Disposal Service site, in Waller County,

DOCUMENT NUMBER:

365

DOCUMENT DATE: NUMBER OF PAGES: 01/13/89

**AUTHOR:** 

001 Thomas L. Owsley, Vice President - Legal

COMPANY/AGENCY:

Crown Central Petroleum Corporation

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Further contact concerning Sheridan Disposal Service can

now be directed to Mr. Owsley

DOCUMENT NUMBER:

366

DOCUMENT DATE:

01/27/89

NUMBER OF PAGES:

010

AUTHOR:

Allyn M. Davis, Director, Hazardous Waste Management Division U.S. EPA Region 6

COMPANY/AGENCY:

RECIPIENT:

See Attached Addressee List

DOCUMENT TYPE:

Notice Letter

DOCUMENT TITLE:

General Notice Letter and Information Request Letter issued to

site PRP's regarding participation in the Remedial

Design/Remedial Action phase of the Sheridan Disposal Service

site cleanup

DOCUMENT NUMBER:

367

DOCUMENT DATE:

02/06/89

NUMBER OF PAGES:

001

AUTHOR:

Wesley W. Masters, President

COMPANY/AGENCY:

Wesley W. Masters

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

#### FINAL

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SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

368

DOCUMENT DATE:

02/08/89

NUMBER OF PAGES:

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**AUTHOR:** 

James W. Josey, President

COMPANY/AGENCY: RECIPIENT: Corrosion Protection Processes of America, Inc. Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Mr. Josey's response to the EPA's Request for Information

Letter

DOCUMENT NUMBER:

369

DOCUMENT DATE:

02/09/89

NUMBER OF PAGES:

007

AUTHOR:

H. Gerald Reynolds, Environmental Counsel

COMPANY/AGENCY: RECIPIENT:

The Celotex Corporation
Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Re: Response to EPA's Notice and Information Request Letter

for Phillip Carey Manufacturing Company

DOCUMENT NUMBER:

370

022

DOCUMENT DATE: NUMBER OF PAGES: 02/10/89

AUTHOR:

Allyn M. Davis, Director, Hazardous Waste Management Division

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

Donald Weisiy, Channel Shipyard

DOCUMENT TYPE:

Notice Letter and Attachments

DOCUMENT TITLE:

Special Notice and Request for Information Letter issued to

Channel Shipyard

DOCUMENT NUMBER:

371

DOCUMENT DATE:

02/10/89

NUMBER OF PAGES:

001

AUTHOR:

Allyn M. Davis, Director, Hazardous Waste Management Division

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

Glen Chance, President, Chance Collar Company

DOCUMENT TYPE:

104 (e) Letter

DOCUMENT TITLE:

Special Notice and Request for Information Letter

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

372

DOCUMENT DATE: NUMBER OF PAGES: 02/10/89

AUTHOR:

028 Larry B. Feldcamp, Chairman

CO APANY/AGENCY:

Sheridan Site Committee, Baker & Botts

RUCIPIENT:

John Wheeler, Occidental Chemical Corporation

DOCUMENT TYPE:

Correspondence and Attachments

DOCUMENT TITLE:

Determination of those company's who will continue to participate in the Sheridan steering committee; and

identification of those PRP's who are now partcipating as le

minimis contributors

DOCUMENT NUMBER:

373

DOCUMENT DATE:

02/10/89

NUMBER OF PAGES:

022

AUTHOR:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

See Attached PRP Addressee List

DOCUMENT TYPE:

Special Notice Letter

DOCUMENT TITLE:

Notified Potentially Responsible Parties for the Sheridan site, of the sixty day Remedial Design/Remedial Alternative

moratorium period

DOCUMENT NUMBER:

374

DOCUMENT DATE:

02/13/89

NUMBER OF PAGES:

001

**AUTHOR:** 

Harold J. Pecunia

COMPANY/AGENCY:

Peterson's Maritime Services, Inc.

RECIPIENT:

Larry B. Feldcamp, Chairman, Sheridan Site Committee, Baker &

Botts

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Update concerning Peterson's possible connection to the

Sheridan Disposal Service site

DOCUMENT NUMBER:

375

DOCUMENT DATE:

02/13/89

NUMBER OF PAGES:

003

AUTHOR:

Lisa Renee Pomerantz, Senior Counsel

COMPANY/AGENCY:

NEC America, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

# 014838

#### ADMINISTRATIVE RECORD INDEX

#### FINAL

SITE NAME: SHERIDAN DISPOSAL SERVICE SITE NUMBER: TXD 062132147

DOCUMENT NUMBER: 376
DOCUMENT DATE: 02/13/

DOCUMENT DATE: 02/13/89 NUMBER OF FAGES: 051

AUTHOR: Leonard P. Pasculli, Senior Counsel - Law Department COMPANY/AGENCY: GAF Corporation

RECIPIENT: Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DUCUMENT TYPE: Response Letter and Attachments

DOCUMENT TITLE: Response to EPA's letter dated January 27, 1989

DOCUMENT NUMBER: 377

DOCUMENT DATE: 02/14/89

NUMBER OF PAGES: 029
AUTHOR: Harold J. P

AUTHOR: Harold J. Pecunia
COMPANY/AGENCY: Peterson Maritime Services, Inc.

RECIPIENT: Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE: Response Letter and Attachments

DOCUMENT TITLE: Response to EPA's letter of January 27, 1989

DOCUMENT NUMBER: 378

DOCUMENT DATE: 02/14/89

NUMBER OF PAGES: 001

AUTHOR: Peter G. Veeder

COMPANY/AGENCY: Thorp, Reed & Armstrong

RECIPIENT: Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE: Response Letter

DOCUMENT TITLE: Response to EPA's Special Notice Letter dated February 10,

1989

DOCUMENT NUMBER: 379

DOCUMENT DATE: 02/14/89

NUMBER OF PAGES: 001

AUTHOR: J. Samuel Listiak, Special Counsel

COMPANY/AGENCY: Star Enterprise

RECIPIENT: Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE: Correspondence

DOCUMENT TITLE: Re: Mr. Listiak's clarification concerning his former

employment at Texaco

# $\mathcal{Q}_{\mathcal{F}}$ M $\infty$ Ø 0

# ADMINISTRATIVE RECORD INDEX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

DOCUMENT DATE:

02/14/89

NUMBER OF PAGES:

001

**AUTHOR:** 

Carlos Leal, Attorney, Legal Department

COMPANY/AGENCY:

The Dow Chemical Company

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Concerning Dow's request for an extension of time in which to

reply to EPA's Request for Information Letter

DOCUMENT NUMBER:

381

DOCUMENT DATE:

02/15/89

NUMBER OF PAGES:

002

AUTHOR:

Peter R. Buenz

COMPANY/AGENCY:

Chemical Exchange, Inc. (CXI)

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Notification to EPA that CXI is an active participant of the

Sheridan Disposal Steering Committee

DOCUMENT NUMBER:

382

DOCUMENT DATE:

02/15/89

NUMBER OF PAGES:

001

AUTHOR:

LeRoy L. DeNooyer, Attorney, Law Department

COMPANY/AGENCY:

Dresser Industries

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

DOCUMENT NUMBER:

383

DOCUMENT DATE:

02/15/89

NUMBER OF PAGES:

076

**AUTHOR:** COMPANY/AGENCY: John N. Baird, Secretary and General Counsel Liquid Air Corporation

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Re: EPA February 10, 1989 Special Notice Letter

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER: DOCUMENT DATE:

384 02/15/89

NUMBER OF PAGES:

001

AUTHOR:

Glenn G. Chance, Former President

COMPANY/AGENCY:

Chance Collar Company

RECIPIENT:

Allyn M. Davis, Director, Hazardous Waste Management Division,

U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Notification to EPA, that Mr. Chance is no longer affiliated

with Chance Collar Company

DOCUMENT NUMBER:

385

DOCUMENT DATE:

02/15/89

NUMBER OF PAGES:

001

AUTHOR:

Madelyn A. Reilly, Attorney - Law Department

COMPANY/AGENCY:

PPG Industries, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Notification to EPA that PPG will continue to participate as a member of the Sheridan Site Committee in the undertaking the

remedial design and remedial action

DOCUMENT NUMBER:

386 DOCUMENT DATE:

02/15/89

NUMBER OF PAGES: **AUTHOR:** 

001

COMPANY/AGENCY:

Bob Reed, Owner/Operator

Texas Pan Service, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Mr. Reed's response to EPA's Request for Information Letter dated January 27, 1989

DOCUMENT NUMBER:

387

DOCUMENT DATE:

02/15/89

NUMBER OF PAGES:

002

AUTHOR: COMPANY/AGENCY:

R.B. Dokell, President Olshan Lemolishing, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER: DOCUMENT DATE: 388

DOCUMENT DATE: NUMBER OF PAGES: 02/15/89 001

AUTHOR:

Tracey L. Smith

COMPANY/AGENCY:

Andrews & Kurth, Attorneys at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:
DOCUMENT TITLE:

Response Letter

Response to the General Notice and Information Request Letter

DOCUMENT NUMBER:

389

DOCUMEN" DATE:

02/17/89

NUMBER OF PAGES:

001

AUTHOR:

W.C. Holbrook, Director, Environmental Affairs

COMPANY/AGENCY:

The B.F. Goodrich Company

RECIPLENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Notification that The B.F. Goodrich Company will continue to

participate with the Sheridan Site Committee in negotiations

with EPA

DOCUMENT NUMBER:

390

DOCUMENT DATE:

02/17/89

NUMBER OF PAGES:

001

AUTHOR:

Greg Ploss, Vice President

COMPANY/AGENCY:

Ploss Industries, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Section, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

DOCUMENT NUMBER:

391

DOCUMENT DATE:

02/17/89 003

NUMBER OF PAGES: AUTHOR:

Clave E. Gill, Attorney

COMPANY/AGENCY:

Gill & Fabacher, Attorneys at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

392

DOCUMENT DATE: NUMBER OF PAGES: 02/17/89

009

**AUTHOR:** COMPANY/AGENCY: Thomas W. Clarke, Vice President, Finance Flint Ink Corporation

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response to EPA's letter dated January 27, 1989

DOCUMENT NUMBER:

DOCUMENT DATE:

02/17/89

NUMBER OF PAGES:

002

AUTHOR:

Charles R. Cunningham, Attorney at Law

COMPANY/AGENCY: RECIPIENT:

Represenative of Briner Paint Mfg. Co. Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response EPA's letter dated February 1, 1989, concerning the

Sheridan Disposal Service site, in Waller County, TX

DOCUMENT NUMBER:

394

DOCUMENT DATE:

02/17/89

NUMBER OF PAGES:

001 Peter R. McCormack, Attorney at Law

AUTHOR: COMPANY/AGENCY:

Cameron Iron Works, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response to EPA's letter dated February 10, 1989

DOCUMENT NUMBER:

395

DOCUMENT DATE:

02/20/89

NUMBER OF PAGES:

001

AUTHOR:

Guy J. Hill, Executive Vice President - General Manager

COMPANY/AGENCY:

Chance Collar Company

RECIPIENT:

Allyn M. Davis, Director, Hazardous Waste Management Division,

U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Notification given to EPA concerning change in contact

for the Chance Collar Company

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

396

DOCUMENT DATE:

02/20/89

NUMBER OF PAGES:

012

**AUTHOR:** 

Scott A. Kelly, Staff Attorney Texas A & M University System

COMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

DOCUMENT NUMBER:

397

DOCUMENT DATE:

02/21/89

NUMBER OF PAGES:

003

AUTHOR:

B.G. Tatum, Sr., President B & G Wireline Service, Inc.

GOMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Mr. Tatum's response to EPA's Request for Information Letter

of January 27, 1989

DOCUMENT NUMBER:

398

DOCUME IT DATE:

02/21/89

NUMBER OF PAGES:

001

AUTHOR: COMPANY/AGENCY:

Loonard O. Pasculli, Senior Counsel - Law Department GAF Corporation

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Request that EPA supply "GAF" with an additional information concerning their possible involvment at the

Sheridan Disposal Service site

DOCUMENT NUMBER:

399

DOCUMENT DATE:

02/27/89

NUMBER OF PAGES:

081

AUTHOR:

Charles R. Cunningham, Attorney at Law

COMPANY/AGENCY:

Representive of the Briner Paint Mfg. Co.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response to the letter dated February 1, 1989, concerning the

Sheridan Disposal Services, Waller County, TX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

400

DOCUMENT DATE:

02/27/89

NUMBER OF PAGES:

002

AUTHOR:

William J. Philbin, Jr., Attorney

COMPANY/AGENCY:

Philbin and Associates, P.C., Attorney's

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region VI

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

401

DOCUMENT DATE:

ù2/27/89

NUMBER OF PAGES:

001

AUTHOR:

R.C. Gasaway, Vice President

COMPANY/AGENCY:

Gulf Valve Company

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

DOCUMENT NUMBER:

402

DOCUMENT DATE:

02/27/89

NUMBER OF PAGES:

002

AUTHOR:

William J. Philbin, Jr.

COMPANY/AGENCY:

Philbin and Associates, Attorneys at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

403

DOCUMENT DATE:

02/27/89

NUMBER OF PAGES:

RECIPIENT:

001

AUTHOR:

T.L. Jennings, Vice-President, Corporate Environmental Affairs

COMPANY/AGENCY:

Occidental Chemical Corporation

Larry B. Feldcamp, Esq., Chairman, Sheridan Site Committee,

Baker & Botts

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Occidental Chemical Corporation decision to participate

as a de minimus party in the Sheridan Site Committee

# S ⊄t $\infty$ d

## ADMINISTRATIVE RECORD INDEX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

404

DOCUMENT DATE: NUMBER OF PAGES:

02/27/89

AUTHOR:

005

COMPANY/AGENCY:

James W. Josey, President Corrosion Protection Processes of America, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Notification that Corrosion Protection Processes of America, Inc. would like to work with the SSC, in paying for 800 gals. of material sent to the site.

DOCUMENT NUMBER:

405

DOCUMENT DATE:

02/28/89

NUMBER OF PAGES:

023

**AUTHOR:** 

Ronald J. Bigelow

COMPANY/AGENCY:

Mayor, Day & Caldwell Attorney's at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

406

DOCUMENT DATE:

02/28/89 001

NUMBER OF PAGES: AUTHOR:

Philip L. Bernstein, Executive Vice President and Chief

Executive Officer

COMPANY/AGENCY:

Jacob Stern & Sons, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Request for an extension until March 17, 1989 to respond to

EPA's letter dated January 27, 1989.

DOCUMENT NUMBER:

407

DOCUMENT DATE:

02/28/89

NUMBER OF PAGES:

002

AUTHOR:

Gordon E. Tate, Attorney Maxus Energy Corporation

COMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

#### FINAL

SITE NAME: SHERIDAN DISPOSAL SERVICE SITE NUMBER: TXD 062132147

DOCUMENT NUMBER: 408 DOCUMENT DATE: 02/28/89 NUMBER OF PAGES: 001

**AUTHOR:** Barry L. Sams, Principal Environmental Engineer, Environmental

Control Department

COMPANY/AGENCY: NL Industries, Inc. RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6 DOCUMENT TYPE: Correspondence

DOCUMENT TITLE: Re: Request for extension of time in which to respond to

EPA's Request for Information Notice Letter of January 27,

1989.

DOCUMENT NUMBER: 409 DOCUMENT DATE: 02/28/89 NUMBER OF PAGES: 008

Hoyt C. Gabbard, Executive Vice President AUTHOR:

COMPANY/AGENCY: The Transport Company of Texas

RECIPIENT: Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE: Response Letter

DOCUMENT TITLE: Response to the General Notice Letter of January 27, 1989 and

the Special Notice Letter of February 10, 1989

DOCUMENT NUMBER: 410 DOCUMENT DATE: 02/28/89 NUMBER OF PAGES: 001

**AUTHOR:** Joseph R. Brendel, Attorney

COMPANY/AGENCY: Thorp, Reed & Armstrong, Attorneys at Law

RECIPIENT: Larry B. Feldcamp, Esq., Chairman, Sheridan Site Committee,

Baker & Botts

DOCUMENT TYPE: Correspondence

DOCUMENT TITLE: Re: de minimus agreement between National Steel Products Co.. former owner of Stran Steel, and the Sheridan Site Committee.

DOCUMENT NUMBER: 411 02/28/89 DOCUMENT DATE: NUMBER OF PAGES: 002

AUTHOR: Michael Rubenstein, Attorney

COMPANY/AGENCY: Liddell, Sapp, Zivley, Hill & LaBoon

Susan Nichols, Legal Assistant, Baker & Botts RECIPIENT:

DOCUMENT TYPE: Correspondence

DOCUMENT TITLE: Re: The volumetric assignments that have been made to the

Robinson Iron & Metal Company

#### FINAL

SITE NAME: SITE NUMBER: SHERIDAN DISPOSAL SERVICE

TXD 062132147

DOCUMENT NUMBER: DOCUMENT DATE:

412 03/01/89

NUMBER OF PAGES:

004

**AUTHOR:** 

COMPANY/AGENCY:

John Schneider, Maintenance Supervisor Varco/Best Flow Products

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE: DOCUMENT TITLE: Response Letter and Attachments

Response to EPA's letter dated February 1, 1989

DOCUMENT NUMBER:

DOCUMENT DATE:

03/01/89

NUMBER OF PAGES:

001

413

**AUTHOR:** COMPANY/AGENCY: Emery B. Miller, President

RECIPIENT:

Emchem Corporation

Ruth L. Izraeli, Remedial Project Manager, Superfund Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE: Response Letter

DOCUMENT TITLE:

Response by Mr. Miller to the January 27, 1989 letter from EPA

DOCUMENT NUMPER:

414

DOCUMENT DATE:

03/01/89

NUMBER OF PAGES:

030

**AUTHOR:** 

Martha E. Horvitz, Regulatory Attorney - Law Department

COMPANY/AGENCY:

Borden, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Reponse Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal Service site

DOCUMENT NUMBER:

415

DOCUMENT DATE:

03/02/89

NUMBER OF PAGES: **AUTHOR:** 

002

COMPANY/AGENCY:

Michael Rubenstein, Attorney Liddell, Sapp, Zivley, Hill & LaBoon

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

416

DOCUMENT DATE:

03/02/89

NUMBER OF PAGES: AUTHOR:

001

COMPANY/AGENCY:

J. Mark Lawless, Attorney

RECIPIENT:

Heron, Burchette, Ruckert & Rothwell Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. RPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Request for extention of time to further investigate the connection between Port Drum Co. and Drum Service Co., Inc.,

who's listed as a PRP for the Sheridan site

DOCUMENT NUMBER:

417

DOCUMENT DATE:

03/02/89

NUMBER OF PAGES:

005

AUTHOR:

RECIPIENT:

John R. Cromer, Esquire

COMPANY/AGENCY:

Cromer, Eaglefield & Maher, P.A., Attorney's at Law Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

418

DOCUMENT DATE:

03/02/89

NUMBER OF PAGES: **AUTHOR:** 

014 Norman A. Dupont, Attorney

COMPANY/AGENCY;

Paul, Hastings, Janofsky & Walker, Attorney's at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response to EPA's letter dated February 1, 1989

DOCUMENT NUMBER:

419

DOCUMENT DATE:

03/02/89 002

NUMBER OF PAGES: AUTHOR:

Romer G. Wilsek, Director, Environmental Affairs/Corporate

Quality

COMPANY/AGENCY:

RECIPIENT:

Kraft, Inc.

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

420

DOCUMENT DATE:

03/02/89

NUMBER OF PAGES:

015

AUTHOR:

Bob Deatherage, Director - Human Resources and Risk Management

COMPANY/AGENCY: RECIPIENT:

Tuboscope, Inc. Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6 Response Letter and Attachments

DOCUMENT TYPE: DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER: DOCUMENT DATE:

421

NUMBER OF PAGES:

03/02/89

016

AUTHOR:

Burton S. Dubowy

COMPANY/AGENCY:

Chance Collar Company

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response to the Notice Letter dated January 27, 1989

DOCUMENT NUMBER:

422

DOCUMENT DATE:

03/02/89

NUMBER OF PAGES:

009

AUTHOR:

Dermot Rigg, P.C., Attorney

COMPANY/AGENCY:

Hoover, Bax & Shearer, Attorneys at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response to EPA's letter dated Janauary 27, 1989

DOCUMENT NUMBER:

423

DOCUMENT DATE:

03/02/89

NUMBER OF PAGES:

065

AUTHOR:

Marcia Drake Seeler, Assistant Environmental Counsel

COMPANY/AGENCY:

W.R. Grace & Co.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

424

DOCUMENT DATE:

03/03/89

NUMBER OF PAGES:

001

AUTHOR:

V. Peter Wynne

COMPANY/AGENCY:

ARCO Chemical Company

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Re: ARCO's willingness, along with all of its affiliates to participate in the Remedial Design/Remedial Action process at the Sheridan Disposal Service site, in Waller County, TX

DOCUMENT NUMBER:

425

DOCUMENT DATE:

03/03/89

NUMBER OF PAGES:

002

AUTHOR:

John R. Wheeler, Corporate Environmental Affairs

COMPANY/AGENCY:

Occidental Chemical Corporation

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

426

DOCUMENT DATE:

03/03/89

NUMBER OF PAGES:

011

AUTHOR:

John S. Palmerton, Vice President, General Manager Marlin Valve Company, Inc.

COMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response to EPA's notice letter of Febrauary 1, 1989

DOCUMENT NUMBER:

427

DOCUMENT DATE:

03/03/89

NUMBER OF PAGES:

003

AUTHOR:

R.J. Robicheaux, Attorney - Legal Department

COMPANY/AGENCY:

Babcock & Wilcox, Attorney's at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

428

DOCUMENT DATE:

03/03/89

NUMBER OF PAGES:

095

AUTHOR:

LeRoy Baranowski, Treasurer

COMPANY/AGENCY:

General Welding Works Incorporated Ruth L. Izraeli, Remedial Project Manager, Superfund

RECIPIENT:

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Notification to EPA that General Welding has agreed to participate as a de minimis member of the Sheridan Site

Committee

DOCUMENT NUMBER:

429

DOCUMENT DATE:

03/03/89

NUMBER OF PAGES:

029

AUTHOR:

Dennis J. McCann, Attorney

COMPANY/AGENCY: RECIPIENT:

Battelle Memorial Institute Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

430

DOCUMENT DATE:

03/03/89

NUMBER OF PAGES:

002

AUTHOR:

Peter L. Keeley, Legal Counsel

COMPANY/AGENCY:

Schlumberger Technology Corporation

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response to EPA's Request for Information letter dated January

27, 1989

DOCUMENT NUMBER:

431

DOCUMENT DATE:

03/06/89 002

NUMBER OF PAGES: AUTHOR:

RECIPIENT:

Alan J. Ritter, Controller

COMPANY/AGENCY:

The Triangle Corporation Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE;

Response Letter

DOCUMENT TITLE:

Correspondence concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

432

DOCUMENT DATE:

03/06/89

NUMBER OF PAGES:

019

AUTHOR:

Charles K. Elder, III, President

COMPANY/AGENCY:

Boring Specialities, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE: DOCUMENT TITLE: Response Letter

Response to EPA's letter dated Janauary 27, 1989

DOCUMENT NUMBER:

433

DOCUMENT DATE:

03/07/89

NUMBER OF PAGES:

001

AUTHOR:

Nancy A. Roberts, Law Department

COMPANY/AGENCY:

Union Pacific Railroad Company

RECIPIENT:

Larry B. Feldcamp, Chairman, Sheridan Site Committee, Baker &

Botts

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Notification that Missouri Pacific/Union Pacific will participate as a de minimis member of the Sheridan Site

Committee

DOCUMENT NUMBER:

434

DOCUMENT DATE:

03/07/89

NUMBER OF PAGES:

050

AUTHOR: COMPANY/AGENCY: Lisa Renee Pomerantz, Senior Counsel

NEC America, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

DOCUMENT NUMBER:

435

DOCUMENT DATE:

03/07/89

NUMBER OF PAGES:

003

AUTHOR:

Arch E. Kelly, President

COMPANY/AGENCY:

Mission Petroleum Carriers, Inc. (Houston)

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

436

DOCUMENT DATE:

03/08/89

NUMBER OF PAGES:

010

AUTHOR:

Scott E. Bosard, President

COMPANY/AGENCY:

Phoenix Oil, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Reponse Letter

DOCUMENT TITLE:

Response to EPA's information request dated January 27, 1989

DOCUMENT NUMBER:

437

DOCUMENT DATE:

03/09/89

NUMBER OF PAGES:

020

AUTHOR:

Pamela J. Cissik, Attorney. Law Department

COMPANY/AGENCY:

Allied-Signal Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response to EPA's Request for Information letter of January

27, 1989

DOCUMENT NUMBER:

438

DOCUMENT DATE:

03/10/89

NUMBER OF PAGES: AUTHOR:

017

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

John Cotterell, Project Manager, Sheridan Site Committee Correspondence

DOCUMENT TYPE:

Re: Comments from the Agency concerning the Laboratory DOCUMENT TITLE: Biodegradation Study Draft Report

DOCUMENT NUMBER:

439

DOCUMENT DATE:

03/13/89

NUMBER OF PAGES:

002

AUTHOR:

Mary E. Hitt

COMPANY/AGENCY:

Thorp, Reed & Armstrong, Attorney's at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Notification that National Steel Products Co., will participate as a de minimis member of the Sheridan Site

Committee, on behalf of Stran Steel

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

440

DOCUMENT DATE:

03/13/89

NUMBER OF PAGES:

002

AUTHOR:

Larry D. Wright, Acting Chief, Superfund Enforcement Branch

COMPANY/AGENCY: U

U.S. EPA Region 6

RECIPIENT:

Raymond P. Churan, Regional Environmental Officer, Department

of the Interior

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Discussion on natural resources damages at the Sheridan

Disposal Service site

DOCUMENT NUMBER:

441

DOCUMENT DATE:

03/14/89

NUMBER OF PAGES:

001

AUTHOR:

Carlos Leal, Attorney, Legal Department

COMPANY/AGENCY:

The Dow Chemical Company

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service, in Waller County, TX

DOCUMENT NUMBER:

442

DOCUMENT DATE:

03/15/89

NUMBER OF PAGES:

003

AUTHOR:

Phillip L. Bernstein, Executive Vice President and Chief

Executive Officer

COMPANY/AGENCY:

Jacob Stern & Sons, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response to EPA's request for information letter dated January

27, 1989

DOCUMENT NUMBER:

443

DOCUMENT DATE:

03/15/89 001

NUMBER OF PAGES:

Audrone M. Karalius, Attorney

AUTHOR:

Nalco Chemical Company

COMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

# 014855

### ADMINISTRATIVE RECORD INDEX

#### FINAL

SITE NAME:

SHERTDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

444

DOCUMENT DATE:

03/17/89

NUMBER OF PAGES:

007

AUTHOR:

William F. Storms, Office Manager

CCMPANY/AGENCY:

Port Drum Company

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response to request for information letter dated January 27,

1989

DOCUMENT NUMBER:

445

DOCUMENT DATE:

03/17/89

NUMBER OF PAGES:

089

AUTHOR:

Janet D. Smith, Associate General Counsel

COMPANY/AGENCY:

NL Sperry-Sun, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response to the January 27, 1989 request for information

letter from EPA

DOCUMENT NUMBER:

446

DOCUMENT DATE:

03/21/89 001

NUMBER OF PAGES: AUTHOR:

Charles R. Cunningham, P.C., Attorney at Law

COMPANY/AGENCY:

Respresenative of Briner Paint Manufacturing Company

RECIPIENT:

Larry B. Feldcamp, Chairman, Sheridan Site Committee, Baker &

Botts

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: The de minimis buyout amount for the Briner

Manufacturing.

DOCUMENT NUMBER:

447

DOCUMENT DATE:

03/22/89 002

NUMBER OF PAGES: AUTHOR:

Greg Ploss, Vice President

COMPANY/AGENCY:

Ploss Industries, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

448

DOCUMENT DATE:

03/23/89

NUMBER OF PAGES:

009

AUTHOR:

William J. O'Kane, Secretary and General Counsel

COMPANY/AGENCY:

Chemical Leaman Tank Lines, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

449

001

DOCUMENT DATE: NUMBER OF PAGES: 03/23/89

AUTHOR:

Christopher S. Colman, General Attorney

COMPANY/AGENCY:

Amerada Hess Corporation

RECIPIENT:

Allyn M. Davis, Director, Hazardous Waste Management Division,

U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

450

DOCUMENT DATE:

03/23/89

NUMBER OF PAGES:

001

AUTHOR: COMPANY/AGENCY:

John M. Cotterell, P.E., Project Manager

RECIPIENT:

Sheridan Site Committee

Ruth L. Izraeli, Remedial Project Manager, Superfund Erforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Sheridan Disposal Service site - Ground Water Migration

Management Feasibility Study

DOCUMENT NUMBER:

451

DOCUMENT DATE:

03/28/89 008

NUMBER OF PAGES: AUTHOR:

Harry J. Schulz, Attorney

COMPANY/AGENCY:

Schulz & Schulz, Attorney's at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

#### FINAL

SITE NAME: SITE NUMBER:

SHERIDAN DISPOSAL SERVICE

TXD 062132147

DOCUMENT NUMBER:

DOCUMENT DATE:

03/28/89

452

NUMBER OF PAGES:

002

**AUTHOR:** 

Allyn M. Davis, Director, Hazardous Waste Management Division COMPANY/AGENCY: U.S. EPA Region 6

RECIPIENT:

Robert T. Stewart, Vice Chairman, Sheridan Site Committee,

Jones, Day, Reavis & Pogue

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

EPA's response to the site committee's query's concerning

stabilization

DOCUMENT NUMBER:

453

DOCUMENT DATE:

03/29/89

NUMBER OF PAGES:

048

**AUTHOR:** 

Philip S. Haag, Attorney

COMPANY/AGENCY:

Hooper & Haag, Attorney's at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

DOCUMENT NUMBER:

454

DOCUMENT DATE: NUMBER OF PAGES:

03/29/89 002

AUTHOR:

COMPANY/AGENCY:

R. Kinnan Golemon, Attorney Brown, Maroney & Oaks Hartline

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response to EPA's letter of February 10, 1989

DOCUMENT NUMBER:

455

DOCUMENT DATE:

03/30/89

NUMBER OF PAGES:

002

AUTHOR:

Michaela E. Conway, Associate Counsel

COMPANY/AGENCY:

Texas Instruments

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Discussion concerning Texas Instrument's willing participation in the Sheridan Site Committee implementation of the Remedial Design/Remedial Action phase of the Sheridan site cleanup

## PINAL

SITE NAME: SITE NUMBER:

SHERIDAN DISPOSAL SERVICE

TXD 062132147

DOCUMENT NUMBER:

456

DOCUMENT DATE: NUMBER OF PAGES:

03/31/89

**AUTHOR:** 

001

COMPANY/AGENCY:

Richard B. Hodgson, Counsel

RECIPIENT:

Olin Corporation

Ruth I. Izraeli, Remedial Project Manager, Superfund Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Correspondence concerning PRP status at the Sheridan Disposal Service site, in Waller County, TX

DOCUMENT NUMBER:

457

DOCUMENT DATE:

04/04/89

NUMBER OF PAGES:

001

**AUTHOR:** 

Ruth L. Izraeli, Remedial Project Manager, Superfund

**Enforcement Branch** 

COMPANY/AGENCY: RECIPIENT:

U.S. EPA Region 6

DOCUMENT TYPE:

Lisa Renee Pomerantz, Senior Counsel, NEC America, Inc.

Correspondence

DOCUMENT TITLE:

Response to PRP's status query

DOCUMENT NUMBER:

458

DOCUMENT DATE:

04/04/89

NUMBER OF PAGES: **AUTHOR:** 

001

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

Harry I. Schulz, Schulz & Schulz - Representatives of Texas

Industrial Services, Inc.

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Response to PRP's status query

DOCUMENT NUMBER:

459

DOCUMENT DATE:

04/05/89

NUMBER OF PAGES:

004

**AUTHOR:** 

Rene A. Chapelle P.E., Ph.D., Vice President/General Manager

COMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP's status at the Sheridan Disposal

Service site, in Waller County, TX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

460

DOCUMENT DATE:

04/07/89

NUMBER OF PAGES:

**AUTHOR:** 

David A. Copeland, Associate Counsel

COMPANY/AGENCY:

Quantum Chemical Corporation

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Notification that Quantum Chemical Corporation (formerly National Distillers and Chemical Corporation) is a member of

the Sheridan Site Committee

DOCUMENT NUMBER:

461

DOCUMENT DATE: NUMBER OF PAGES:

04/11/89 001

AUTHOR:

Elizabeth A. Hurst, Attorney

COMPANY/AGENCY:

Jenkens & Gilchrist

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Request for extension of time to respond to EPA's request for information letter on behalf of Coastal Transport, Inc.

DOCUMENT NUMBER:

462

DOCUMENT DATE:

04/11/89

NUMBER OF PAGES:

001

AUTHOR:

Larry B. Feldcamp, Chairman, Sheridan Site Committee Baker & Botts

COMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

EPA's response concerning site committee's query regarding

Modar

DOCUMENT NUMBER:

467

DOCUMENT DATE:

04/14/89

NUMBER OF PAGES:

004

**AUTHOR:** 

Richard Amack

COMPANY/AGENCY:

Crystal Chemical Inter-America

RECIPIENT:

Allyn M. Davis, Director, Hazardous Waste Management Division,

U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence and Attachments

DOCUMENT TITLE:

Correspondence concerning Crystal Chemical Inter-/ wrica PRP

status at the Sheridan Disposal Service site, in Waller

County, TX

#### FINAL

SITE NAME: SHERIDAN DISPOSAL SERVICE

SITE NUMBER: TXD 062132147

DOCUMENT NUMBER: 464 DOCUMENT DATE: 04/14/89

NUMBER OF PAGES: 002

AUTHOR: R. Davy Eaglesfield, III - Attorney

COMPANY/AGENCY: Cromer, Eaglesfield & Maher P.A. - Attorney's at Law RLUIPIENT: Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE: Response Letter

DOCUMENT TITLE: Response to the Special Notice Letter of February 10, 1989

from Upjohn

DOCUMENT NUMBER: 465 DOCUMENT DATE: 04/14/89

NUMBER OF PAGES: 002

**AUTHOR:** 

Charles R. Cunningham, P.C., Attorney at Law COMPANY/AGENCY: Represenative of Briner Paint Manufacturers, Inc. RECIPIENT: Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DCCUMENT TYPE: Response Letter

Additional response to EPA's letter dated February 10, 1989 DOCUMENT TITLE:

DOCUMENT NUMBER: 466

DOCUMENT DATE: 04/14/89

NUMBER OF PAGES: 004

**AUTHOR:** R. Davy Eaglesfield, III - Attorney COMPANY/AGENCY: Cromer, Eaglesfield & Maher P.A.

Larry B. Feldcamp, Chairman, Sheridan Site Committee, Baker & RECIPIENT:

**Botts** 

DOCUMENT TYPE: Correspondence

DOCUMENT TITLE: Discussion concerning Upjohn's PRP status at the Sheridan

Disposal Service site

DOCUMENT NUMBER: 467

DOCUMENT DATE: 04/14/89

NUMBER OF PAGES: 001

Richard Amack AUTHOR:

COMPANY/AGENCY: Crystal Chemical Inter-America

Larry B. Feldcamp, Chairman, Sheridan Site Committee, Baker & RECIPIENT:

Botts

DOCUMENT TYPE: Correspondence

DOCUMENT TITLE: Second correspondence concerning Crystal Chemical

Inter-America PRP status at the Sheridan Disposal Service site

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

468

DOCUMENT DATE: NUMBER OF PAGES: 04/14/89 010

AUTHOR:

Larry B. Feldcamp, Chairman, and Robert T. Stewart, Vice

President

COMPANY/AGENCY:

Sheridan Site Committee

RECIPIENT:

Pamela Phillips, Senior Assistant Regional Counsel, Office of

Regional Counsel, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Good Faith Proposal for Sheridan Disposal Services

Remedial Design/Remedial Action

DOCUMENT NUMBER:

469

DOCUMENT DATE:

04/20/89

NUMBER OF PAGES:

003

**AUTHOR:** 

RECIPIENT:

Robert Wilson, Attorney

COMPANY/AGENCY:

McGinnis, Lochridge & Kilgore, Attorney's at Law Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response on behalf of Liberty Waste and Disposal Company concerning it's status as a PRP at Sheridan Disposal Service

DOCUMENT NUMBER:

470

DOCUMENT DATE:

04/20/89

NUMBER OF PAGES:

001

AUTHOR:

Raymond P. Churan, Regional Environmental Officer

COMPANY/AGENCY:

United States Department of the Interior

RECIPIENT:

Larry D. Wright, Superfund Enforcement Branch, U.S. EPA Region

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Involvement of the U.S. Department of Interior as a natural resource trustee for the Sheridan Disposal Service

site

DOCUMENT NUMBER:

471

DOCUMENT DATE:

04/20/89

NUMBER OF PAGES:

011

AUTHOR:

Staff Consultants

COMPANY/AGENCY:

RECIPIENT:

Agency for Toxic Substances and Disease Registry (ATSDR) Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

DOCUMENT TITLE:

The Health Assessment for the Sheridan Disposal Service site.

in Waller County, TX

# 014862

#### ADMINISTRATIVE RECORD INDEX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

472

DOCUMENT DATE:

04/24/89

NUMBER OF PAGES:

001

AUTHOR:

Sam Becker, Chief, Superfund Enforcement Branch U.S. EPA Region VI

COMPANY/AGENCY: RECIPIENT:

Alan J. Ritter, Controller, The Triangle Corporation

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

EPA's response to query concerning PRP status

DOCUMENT NUMBER:

473

DOCUMENT DATE:

04/27/89

NUMBER OF PAGES:

001

AUTHOR:

Sam Becker, Chief, Superfund Enforcement Branch

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

Ronald J. Bigelow, Mayor, Day and Caldwell Attorney's at Law

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Request for additional information detailing their involvement at the Sheridan Disposal Service site, in Waller County, TX

DOCUMENT NUMBER:

474

DOCUMENT DATE:

04/27/89

NUMBER OF PAGES:

002

AUTHOR:

Sam Becker, Chief, Superfund Enforcement Branch

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

Gary English, Positive Feed, Inc.

DOCUMENT TYPE:

104 (e) Request for Information Letter

DOCUMENT TITLE:

Re: Request for Information Pursuant to Section 104 of CERCLA and Section 3007 of RCRA, for the Sheridan Disposal Service

site in Waller County, TX

DOCUMENT NUMBER:

475

002

DOCUMENT DATE:

04/27/89

NUMBER OF PAGES: AUTHOR:

Allyn M. Davis, Director, Hazardous Waste Management Division

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

R.L. Atwell, Jr., President, Coastal Transport Company

DOCUMENT TYPE:

Request for Information Letter

DOCUMENT TITLE:

Re: Request for Information pursuant to Section 104 of CERCLA and Section 3007 of RCRA, for Sheridan Disposal Services,

Waller County, TX

#### FINAL

SITE NAME: SHERIDAN DISPOSAL SERVICE SITE NUMBER: TXD 062132147

DOCUMENT NUMBER: 476
DOCUMENT DATE: 04/27/89
NUMBER OF PAGES: 001

AUTHOR: Sam Becker, Chief, Superfund Enforcement Branch COMPANY/AGENCY: U.S. EPA Region 6

RECIPIENT: Leonard P. Pasvilli, Law Department, GAF Incorporated

DOCUMENT TYPE: Correspondence

DOCUMENT TITLE: Response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

DOCUMENT NUMBER: 477
DOCUMENT DATE: 04/27/89
NUMBER OF PAGES: 001

NUMBER OF PAGES: UUI

AUTHOR: Sam Becker, Chief, Superfund Enforcement Branch COMPANY/AGENCY: U.S. EPA Region 6

RECIPIENT: Phillip L. Bernstein, Attorney, Jacob Stern & Sons, Inc. DOCUMENT TYPE: Correspondence

DOCUMENT TITLE: Discussion concerning analyses that was submitted regarding

the waste their client produces; and resubmittal of additional analyses that would further substantiate the claim that

they're not PRP's

DOCUMENT NUMBER: 478
DOCUMENT DATE: 04/27/89

NUMBER OF PAGES: 001

AUTHOR: Sam Becker, Chief, Superfund Enforcement Branch

COMPANY/AGENCY: U.S. SPA Region 6

RECIPIENT: Bob Reed, Texas Pan Services
DOCUMENT TYPE: Correspondence

DOCUMENT TITLE: Request for additional information concerning the former

owners of the Texas Pan Services

DOCUMENT NUMBER: 479
DOCUMENT DATE: 04/28/89
NUMBER OF PAGES: 002

AUTHOR: Pamela J. Cissik, Attorney, Law Department

COMPANY/AGENCY: Allied-Signal Inc.

RECIPIENT: Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE: Response Letter

DOCUMENT TITLE: Response to EPA's letter of February 10, 1989

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

480

DOCUMENT DATE:

04/28/89

NUMBER OF PAGES:

001

AUTHOR: COMPANY/AGENCY:

Hoyt C. Gabbard, Executive Vice President

RECIPIENT:

The Transport Company of Texas
Sam Becker, Chief, Superfund Enforcement Branch, U.S. EPA

Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

481

DOCUMENT DATE:

04/28/89

NUMBER OF PAGES:

001

AUTHOR:

Elizabeth A. Hurst

COMPANY/AGENCY:

Jenkens & Gilchrist

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

482

259

DOCUMENT DATE:

04/28/89

NUMBER OF PAGES: AUTHOR:

Elizabeth A. Hurst

COMPANY/AGENCY:

Jenkens & Gilchrist

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence and Attachments

DOCUMENT TITLE:

Response to EPA's Request for Information Letter dated January

27, 1989

DOCUMENT NUMBER:

483

DGCUMENT DATE:

04/28/89 003

NUMBER OF PAGES: AUTHOR:

Allen Medine, Ph.D., Work Assignment Manager

COMPANY/AGENCY:

Jacobs Engineering Group, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Trip Report for the Groundwater Sampling Oversight and Split Sampling for Sheridan Disposal Service Site, April 11 -

12, 1989

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

484

DOCUMENT DATE:

05/02/89

NUMBER OF PAGES:

001

AUTHOR: COMPANY/AGENCY: Sam Becker, Chief, Superfund Enforcement Branch U.S. EPA Region 6

RECIPIENT:

Bob Deatherage, Director, Human Resources & Risk Management, Tuboscope, Inc.

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Request by EPA for additional information concerning PRP's status at the Sheridan Disposal Service site, in Waller

County, TX

DOCUMENT NUMBER:

485

DOCUMENT DATE:

05/02/89

NUMBER OF PAGES:

001

**AUTHOR:** 

Ruth L. Izraeli, Remedial Project Manager, Superfund Enforcement Branch

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

U.S. EPA Region 6 Site Files

DOCUMENT TYPE:

Comments

DOCUMENT TITLE:

Comments on the Sheridan Disposal Service Ground Water

Migration Management Feasibility Study

DOCUMENT NUMBER:

486

DOCUMENT DATE:

05/09/89

NUMBER OF PAGES:

003

**AUTHOR:** 

Allan J. Ritter, Controller The Triangle Corporation

COMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial reoject Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Freedom of Information Act Request for the Sheridan Disposal

Service site, in Waller County, TX

DOCUMENT NUMBER:

487

DOCUMENT DATE:

05/11/89

NUMBER OF PAGES:

AUTHOR:

Gerardo García, Remedial Investigation Unit, Contract Remedial Activies Section

COMPANY/AGENCY:

Texas Water Commission

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: State of Texas Applicable or Relevant and Appropriate Requirements (ARARs) for the Sheridan Disposal Services

Superfund Site

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

488

DOCUMENT DATE: NUMBER OF PAGES:

05/11/89

001

AUTHOR:

Susan B. Nichols, Legal Assistant

COMPANY/AGENCY:

Baker & Botts

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

EPA's response concerning PRP status at the Sheridan Disposal

Service site, in Waller County, TX

DOCUMENT NUMBER:

DOCUMENT DATE:

05/15/89

NUMBER OF PAGES:

002

AUTHOR:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch

COMPANY/AGENCY:

U.S. EPA Region VI

RECIPIENT:

R.C. Gasaway, Vice President, Gulf Valve Company

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

EPA's response concerning PRP's status at the Sheridan

Disposal Service site, in Waller County, TX

DOCUMENT NUMBER:

490

DOCUMENT DATE:

05/15/89

NUMBER OF PAGES:

003

AUTHOR:

Philip S. Haag, Attorney

COMPANY/AGENCY:

Hooper & Haag, Attorney's at Law

RECIPIENT:

Larry B. Feldcamp, Chairman, Sheridan Site Committee, Baker &

DOCUMENT TYPE:

Correspondence and Attachments

DOCUMENT TITLE:

Re: Meetings with members of the Sheridan Site Committee

Allocation Committee

DOCUMENT NUMBER:

491

DOCUMENT DATE:

05/15/89

NUMBER OF PAGES:

007

AUTHOR:

Lisa Renee Pomerantz, Senior Counsel

COMPANY/AGENCY: RECIPIENT:

NEC America, Inc.

Ruth L. Izraeli, Remedial Project Manager, Superfund Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE TXD 062132147

SITE NUMBER:

492

DOCUMENT NUMBER: DOCUMENT DATE:

05/16/89

NUMBER OF PAGES:

001

**AUTHOR:** 

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch

COMPANY/AGENCY:

U.S. EPA Region VI

RECIPIENT:

Lisa Rense Pomerantz, Senior Counsel, NEC America, Inc.

DOCUMENT TYPE: Correspondence

DOCUMENT TITLE:

EPA's response concerning PRP status

DOCUMENT NUMBER: DOCUMENT DATE:

493

NUMBER OF PAGES:

05/20/89 180

**AUTHOR:** 

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

Cynthia Morocco, Jacob Stern and Sons

DOCUMENT TYPE:

Correspondence and Attachments

DOCUMENT TITLE:

Freedom of Information Request documentation relative to the Sheridan Lisposal Service site, in Waller County, TX

DOCUMENT NUMBER:

494

DOCUMENT DATE:

05/22/89

NUMBER OF PAGES:

001

AUTHOR:

Stan Hitt, Chief, Superfund Enforcement Texas Section

COMPANY/AGENCY:

U.S. EPA Region VI

RECIPIENT:

Richard Amack, Crystal Chemical Inter-America Correspondence

DOCUMENT TYPE:

DOCUMENT TITLE:

EPA's response concerning PRP status

DOCUMENT NUMBER:

495

DOCUMENT DATE:

05/22/89

NUMBER OF PAGES:

001

**AUTHOR:** COMPANY/AGENCY:

Susan B. Nichols, Legal Assistant Baker & Botts

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP's status

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

496

DOCUMENT DATE:

05/22/89

NUMBER OF PAGES:

002

AUTHOR:

Richard Fuller

COMPANY/AGENCY:

ERM-Southwest, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Texas Remedial

Section, U.S. EPA Region 6

DOCUMENT TYPE:

Notes

DOCUMENT TITLE:

Ground Water Feasibility Study calculations of spacing of

recovery wells

DOCUMENT NUMBER:

497

DOCUMENT DATE:

05/22/89

NUMBER OF PAGES:

001

AUTHOR:

Kenneth Huffman, Ph.D., Chief, Industrial Permits Section

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

Stan Hitt, Chief, Texas Enforcement Section, U.S. EPA Region 6

DOCUMENT TYPE:

Memorandum

DOCUMENT TITLE:

Re: Sheridan Disposal Services Technology Based Limits

DOCUMENT NUMBER:

498

DOCUMENT DATE:

05/22/89

NUMBER OF PACES:

RECIPIENT:

903

AUTHOR:

R. Kinnan Golemon, Attorney

COMPANY/AGENCY:

Brown, Maroney & Oaks Hartline, Attorney's at Law Ruth L. Idraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. SPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Response to Section 104 Request for Information for the

Sheridan Disposal Services site

DOCUMENT NUMBER:

499

003

DOCUMENT DATE:

05/22/89

NUMBER OF PAGES:

Richard H. Fuller, P.G., Principal

AUTHOR: COMPANY/AGENCY:

EPM-Southwest, Inc.

RECIPIENT:

Ruth I. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DO MENT TITLE

EPA comments to the March 23, 1989 Draft Ground Water Migration Management Feasibility Study for the Sheridan

Disposal Service site, in Waller County, TX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

500

DOCUMENT DATE: NUMBER OF PAGES: 05/24/89 001

AUTHOR:

Ronald J. Bigelow, Attorney

COMPANY/AGENCY:

Mayor, Day & Caldwell, Atcorney's at Law

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Response concerning PRP status

DOCUMENT NUMBER:

501

DOCUMENT DATE:

05/26/89

NUMBER OF PAGES;

001

AUTHOR:

William J. Philbin, Attorney

COMPANY/AGENCY:

Philbin and Associates, P.C., Attorney's at Law Ruth L. Izraeli, Remedial Project Manager, Superfund

RECIPIENT:

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response to EPA's Request for Information Letter regarding the

Sheridan Disposal Service site

DOCUMENT NUMBER:

502

DOCUMENT DATE:

05/30/89

NUMBER OF PAGES:

007

AUTHOR:

Charles R. Herbeck, Attorney

COMPANY/AGENCY RECIPIENT:

Mabry, Herbeck & Chilton, P.C., Attorney's at Law Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

503

DOCUMENT DATE:

05/31/89

NUMBER OF PAGES:

004 Philip S. Haag, Attorney

AUTHOR:

Hooper & Haag, Attorney's at Law

COMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachment

DOCUMENT TITLE:

Re: Request for Information pursuant to Section 104 of CERCLA and Section 3007 of RCRA, for the Sheridan Disposal Services

site, in Waller County, TX

#### PINAL

SITE NAME: SHERIDAN DISPOSAL SERVICE SITE NUMBER: TXD 062132147

DOCUMENT NUMBER: 504

06/01/89 DOCUMENT DATE:

NUMBER OF PAGES:

**AUTHOR:** Philip S. Haag, Attorney

COMPANY/AGENCY: Hooper & Haag, Attorney's at Law

RECIPIENT: Larry B. Feldcamp, Chairman, Sheridan Site Committee, Baker &

Botts

DOCUMENT TYPE: Response Letter

DOCUMENT TITLE: Response concerning PRP status at the Sheridan Dispsoal

Service site

DOCUMENT NUMBER:

505 DOCUMENT DATE: 06/07/89 003

NUMBER OF PAGES: **AUTHOR:** 

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch COMPANY/AGENCY: U.S. EPA Region 6

RECIPIENT:

Don Gifford, The Triangle Corporation

DOCUMENT TYPE:

Fax and Attachments

DOCUMENT TITLE:

104 (e) Request for Information Letter submitted to The

Triangle Corporation

DOCUMENT NUMBER. 506

DOCUMENT DATE:

06/16/89

NUMBER OF PAGES:

001

**AUTHOR:** 

Margaret K. Moore-Smith, Paralegal Specialist

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

Lisa Renee Pomerantz, Senior Counsel, NEC America, Inc.

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Letter from EPA that was mailed in error.

DOCUMENT NUMBER:

507

DOCUMENT DATE:

06/16/89

NUMBER OF PAGES:

003

**AUTHOR:** 

A. Thomas Kajander, Attorney

COMPANY/AGENCY:

Sharpe & Kajander, Attorney's at Law

RECIPIENT: Ruth L. Izraeli, Remedial Project Manager and Pamela Phillips. Attorney, ORC, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

508

DOCUMENT DATE:

06/21/89

NUMBER OF PAGES:

002

**AUTHOR:** 

Philip L. Bernstein, President

COMPANY/AGENCY:

Jacob Stern & Sons, Inc.

RECIPIENT:

Sam Becker, Chief, Supefund Enforcemnt Branch, U.S. EPA Region

6

DOCUMENT TYPE:

Response Letter

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

509

DOCUMENT DATE:

06/26/89

NUMBER OF PAGES:

014

AUTHOR:

Alan J. Ritter, Controller

COMPANY/AGENCY:

The Triangle Corporation

RECIPIENT:

Pamela Phillips, Senior Attorney, Office of Regional Counsel,

U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response concerning PRP status at the Sheridan Disposal

Service site

DOCUMENT NUMBER:

510

002

DOCUMENT DATE:

06/28/89

NUMBER OF PAGES: AUTHOR:

Ann N. McGinley, Chief, Wastewater Permits Section, Water

Quality Division

COMPANY/AGENCY:

Texas Water Commission

RECIPIENT:

Jackson Kramer, Chief, Contract Remedial Activities Sect.,

Hazardous and Solid Waste Div., EPA R-6

DOCUMENT TYPE:

Memorandum

DOCUMENT TITLE:

Re: Effluent Limitations for Wastewater from Sheridan

Disposal Service, in Waller County, TX

DOCUMENT NUMBER:

511

DOCUMENT DATE:

06/30/89

NUMBER OF PAGES:

093

AUTHOR:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

John Cotterell, Project Manager, Sheridan Site Committee

DOCUMENT TYPE:

Correspondence and Attached Comments

DOCUMENT TITLE:

Re: Sheridan Disposal Services Ground Water Migration

Management Feasibility Study (FS) comments

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

512

DOCUMENT DATE:

07/03/89

NUMBER OF PAGES:

001

AUTHOR:

John Cotterell, P.E., Project Manager

COMPANY/AGENCY:

Sheridan Site Steering Committee

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Transmittal letter for the second Ground Water Sampling Event, for the Sheridan Disposal Service site, in Waller County, TX

DOCUMENT NUMBER:

513

DOCUMENT DATE:

07/03/89

NUMBER OF PAGES:

060

AUTHOR:

Staff Consultants (for the Sheridan Site Committee) ERM-Southwest, Inc.

COMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

DOCUMENT TITLE:

Second Priority Pollutant Ground Water Sampling Event Ground Water Migration Management Remedial Investigation for the Sheridan Disposal Service site, in Waller County, TX

DOCUMENT NUMBER:

514

DOCUMENT DATE:

07/05/89 002

NUMBER OF PAGES: AUTHOR:

Donald W. Beaver, Ph.D., Senior Geohydrogeologist

COMPANY/AGENCY:

Jacobs Engineering Group, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Section, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Sheridan Disposal Service Groundwater Migration Management FS Supplemental Analyses of Extraction Well Field and Slurry Wall

Efficiency

DOCUMENT NUMBER:

515

DOCUMENT DATE:

07/11/89

NUMBER OF PAGES:

002

AUTHOR:

James F. Pendergast, Chief, Toxics Control Section

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Memorandum

DOCUMENT TITLE:

Re: NPDES Requirements for the Sheridan Disposal Service

site, in Waller County, TX

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

516

DOCUMENT DATE:

07/12/89

NUMBER OF PAGES:

055

AUTHOR:

William R. Scofield, Attorney KSA Industries, Inc.

COMPANY/AGENCY: RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Superfund

Enforcement Branch, U.S. EPA Region 6

DOCUMENT TYPE:

Response Letter and Attachments

DOCUMENT TITLE:

Response to EPA's letter dated January 27, 1989

DOCUMENT NUMBER:

517

DOCUMENT DATE:

07/20/89

NUMBER OF PAGES:

001

AUTHOR:

John M. Cotterell, P.E., Project Manager

COMPANY/AGENCY:

Sheridan Site Committee

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Texas Remedial

Section, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Revised pages for the Groundwater Feasibility Study,

Sheridan Site

DOCUMENT NUMBER:

518

DOCUMENT DATE:

07/25/89

NUMBER OF PAGES:

166

AUTHOR: COMPANY/AGENCY:

Staff Consultants

ERM-Southwest, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Texas Remedial

Section, U.S. EPA Region 6

DOCUMENT TYPE:

Report

DOCUMENT TITLE:

Final Ground Water Migration Management Feasibility Study for the Sheridan Disposal Service site, in Waller County, TX

DOCUMENT NUMBER:

519

DOCUMENT DATE:

07/26/89 001

NUMBER OF PAGES: AUTHOR:

Ruth L. Izraeli, Remedial Project Manager, Texas Remedial

Section

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

John Cotterell, Project Manager, Sheridan Site Committee

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: EPA's approval of the Ground Water Migration Management

Fessibility Study

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

520

DOCUMENT DATE:

COMPANY/AGENCY:

07/25/89

NUMBER OF PAGES:

001

**AUTHOR:** 

Staff Consultants ERM-Southwest, Inc.

RECIPIENT:

Ruth L. Izraeli, Remedial Project Manager, Texas Remedial

Section, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Transmittal letter for the Ground Water Migration Management

Feasibility Study

DOCUMENT NUMBER:

521

DOCUMENT DATE:

07/31/89

NUMBER OF PAGES:

006

AUTHOR:

Ellen Greeney, Community Relations Coordinator

COMPANY/AGENCY: RECIPIENT:

U.S. EPA Region 6 Residents of Hempstead, Waller County, TX

DOCUMENT TYPE:

Fact Sheet

DOCUMENT TITLE:

Notice given to the residents, that the public comment period

opens August 14, for the Sheridan Disposal Service site

DOCUMENT NUMBER:

522

DOCUMENT DATE:

07/26/89

NUMBER OF PAGES:

002

AUTHOR:

Allen J. Medine, Ph.D., Work Assignment Manager

COMPANY/AGENCY:

Jacob Engineering Groups, Inc.

RECIPIENT:

Ruth Izraeli, Remedial Project Manager, Texas Section, U.S.

EPA Region 6

DOCUMENT TYPE:

Memorandum

DOCUMENT TITLE:

Sheridan Disposal Services Site, TES 6 Work Assignment No. 183, Review of Second Priority Pollutant Groundwater Sampling

Event and Groundwater Migration Management Remedial

Investigation

**DOCUMENT NUMBER:** 

523

DOCUMENT DATE:

08/11/89

NUMBER OF PAGES:

001

**AUTHOR:** 

Ruth Izraeli, Remedial Project Manager, Texas Section

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

John Cotterell, Project Manager, Sheridan Site Committee

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Review of the Second Groundwater Sampling Event

#### FINAL

SITE NAME:

SHERIDAN DISPOSAL SERVICE

SITE NUMBER:

TXD 062132147

DOCUMENT NUMBER:

524

DOCUMENT DATE:

08/31/89

NUMBER OF PAGES:

002

**AUTHOR:** 

Gerardo H. Garcia, Remedial Investigation Unit, Contract and

Remedial Activities Section

COMPANY/AGENCY:

Texas Water Commission

RECIPIENT:

Ruth Izraeli, Remedial Project Manager, Texas Section, U.S.

EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Comments concerning Sheridan Disposal Services Superfund

Site Draft Record of Decision

DOCUMENT NUMBER:

525

DOCUMENT DATE:

09/22/89

NUMBER OF PAGES:

001

AUTHOR:

Allen Beinke, Executive Director

COMPANY/AGENCY:

Texas Water Commission

RECIPIENT:

Allyn M. Davis, Ph.D., Director, Hazardous Management

Division, U.S. EPA Region 6

DOCUMENT TYPE:

Correspondence

DOCUMENT TITLE:

Re: Sheridan Disposal Service Superfund Site Draft Record of

Decision Ground Water Migration Management Operable Unit

DOCUMENT NUMBER:

525

DOCUMENT DATE:

09/27/89

NUMBER OF PAGES:

040

AUTHOR:

Superfund Enforcement Branch Staff

COMPANY/AGENCY:

U.S. EPA Region 6

RECIPIENT:

U.S. EPA Region 6 Site Files

DOCUMENT TYPE:

ROD

DOCUMENT TITLE:

Record of Decision for the Sheridan Disposal Service Ground Water Migration Management Operable Unit signed by Robert

Layton, Regional Administrator